Part A, Permit Process --- Internal Checklist

ID Number TXD020800371 Inst Name REXENE CO. BAYPORT PLANT

Refer to Form No:	Interim Regulatory Requirements	Indicate by your initials: Yes	No	Valid Prmlg Date?
	PHASE ONE			
1	T/S/D Facility? (If No, return to respondent.)	MS		
3	Form 1 received?	MS		
1	Form 3 received?	MS		
1 & 3	Postmarked on or before November 19, 1980?	MS		
3	Date of operation entered?	MS		
3	Date of operation on or before November 19, 1980?	MS		
Notif. record	Notifier?	MS		
"	Notified on or before August 18, 1980?	MS		
1	Form 1, XIII B signed?	MS		
3	Form 3, IX B Signed?	MS		

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: _____)

PHASE TWO

1	Unsure if regulated or non-regulated?		
3	New facility?		
1 & 3	Core items missing? If Yes, indicate which items:		

Facility name___; location___; mail address___; operator info___;

certification___; process info___; waste info___; owner___; sigs___.

PHASE THREE

1 & 3 Non-core items missing? If Yes, indicate which items:

Maps___; photos___; drawings___; lat/long___.

Other observations and comments:

Received Date Stamp

86-11-19

(Stamp forms also)

Log out/Log in on reverse side.

OUT

IDENTIFICATION OF RECORD (NUMBER, TITLE AND/OR SUBJECT, DATE OF FILE OR DOCUMENT)	CHARGED TO (PERSON & OFFICE)	DATE CHARGED OUT
Part A	C. Huegele, 6AEP1	2-6-81
A013	Key Punch	6-5-81

OPTIONAL FORM 23
FEB 1962
GSA Circular No. 259

CHARGEOUT RECORD

5023-101

GPO [illegible]

DATE CHARGED OUT	CHARGED TO (PERSON & OFFICE)	IDENTIFICATION OF RECORD (NUMBER, TITLE AND/OR SUBJECT, DATE OF FILE OR DOCUMENT)

OUT

Please print or type in the unshaded areas only (fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

153

FORM 1 GENERAL | EPA | U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F T X D 0 2 0 8 0 0 3 7 1 3 D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill–in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill–in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold–faced terms**.

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP REXENE CO BAYPORT PLANT

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 THIBODEAUX, HUGH, PLANT MANAGER	713 474 3211

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 9802 FAIRMONT PARKWAY

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 PASADENA	TX	77507

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 9802 FAIRMONT PARKWAY

B. COUNTY NAME

HARRIS

RECEIVED NOV 19 1980

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 PASADENA	TX	77507	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

	A. FIRST	B. SECOND
	2821 (specify) Polyolefin Resins	(specify)
	C. THIRD	D. FOURTH
	(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: REXENE COMPANY

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other," specify.)
F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE
P (specify)

D. PHONE (area code & no.): 713 474 3211

E. STREET OR P.O. BOX: 9802 FAIRMONT PARKWAY

F. CITY OR TOWN: PASADENA

G. STATE: TX

H. ZIP CODE: 77507

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)		D. PSD (Air Emissions from Proposed Sources)	
B. UIC (Underground Injection of Fluids)		E. OTHER (specify)	3126 (specify) Polypropylene operating permit from Texas Air Control Boar
C. RCRA (Hazardous Wastes)		F. OTHER (specify)	4157 (specify) Polyethylene Operating permit from Texas Air Control Boar

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of polypropylene and low density polyethylene from propylene and ethylene feedstocks.

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Alfred Slatin, President Rexene Company	Alfred Slatin	11/18/80

COMMENTS FOR OFFICIAL USE ONLY

C:

...nt or type in the unshaded areas ... areas are spaced for elite type, i.e. ... characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S													T/A	C
F	T	X	D	0	2	0	8	0	0	3	7	1	3	1
1	2											13	14	15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
A (23)	8 0 1 1 1 9 (24 - 29)	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] (71) 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] (71) 2. NEW FACILITY *(Complete item below.)*

C	YR.	MO.	DAY
8 (15)	7 6 (73 74)	0 8 (75 76)	2 1 (77 78)

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
(73 74)	(75 76)	(77 78)

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] (72) 1. FACILITY HAS INTERIM STATUS

[ ] (72) 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided, Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S													T/A	C
C			D	U	P									I
1	2											13	14	15

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 2	69,000.000	G	
2	S 0 1	55.000	G	
3	T 0 4	~~300~~ 9600.000 ~~400.000~~	~~E~~ H	
4	~~T 0 4~~	~~100~~	~~E~~	

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Description of Line #3 of Item III:

Aluminum alkyls, pyrophoric cocatalysts used in the polypropylene reaction, are flushed from process equipment (with a solvent) to a ground flare where it spontaneously ignites and burns in the presence of air. This is an intermittent operation.

Description of Line #4 of Item III:

Methanol, used in equipment drying, and mineral oil, contaminated by sodium, are burned in the plant fire training area during fire training exercises. Fire training exercises are held approximately 20 times per year.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES

For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION — If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 6 4	900	P	T 0 2 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	T	T 0 3 D 8 0	
X-4	D 0 0 2			000	included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY													
S												T/A	C		S											T/A	C	
W	T	X	D	0	2	0	8	0	0	3	7	1	3	1	W	D	U	P									2	D U P
1	2										13	14	15		1	2								13	14	15	22		26

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
20-22	23 - 26	27 - 35	36	27 - 29	27 - 29	27 - 29	27 - 29	
1	F 0 0 3	500,000.000	P	S 0 2				
2	D 0 0 1	~~3,000,000~~ 1 500.000	~~T~~ P	S 0 2				
3	D 0 0 2	50,000.000	P	S 0 2				
4	D 0 0 3	10,000.000	P	S 0 1				
5	D 0 0 3	5,000.000	P	S 0 1	T 0 4			
6	D 0 0 1	1,000.000	P	S 0 1				
7	D 0 0 1	8,000.000	P	S 0 1	T 0 4			
8	D 0 0 3	2,000.000	P	T 0 4				
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26	23 - 26	27 - 35	36	27 - 29	27 - 29	27 - 29	27 - 29	

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

T | T X D 0 2 0 8 0 0 3 7 1 3 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*. F6. 55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures, existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas *(see instructions for more detail)*. A/56 F6.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*			LONGITUDE *(degrees, minutes, & seconds)*		
29	38	00 5	095	04	050

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

☒ B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

C	1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	El Paso Polyolefins Company	201 262 6500

	3. STREET OR P.O. BOX		4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	P. O. Box 665	G	Paramus	NJ	07652

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

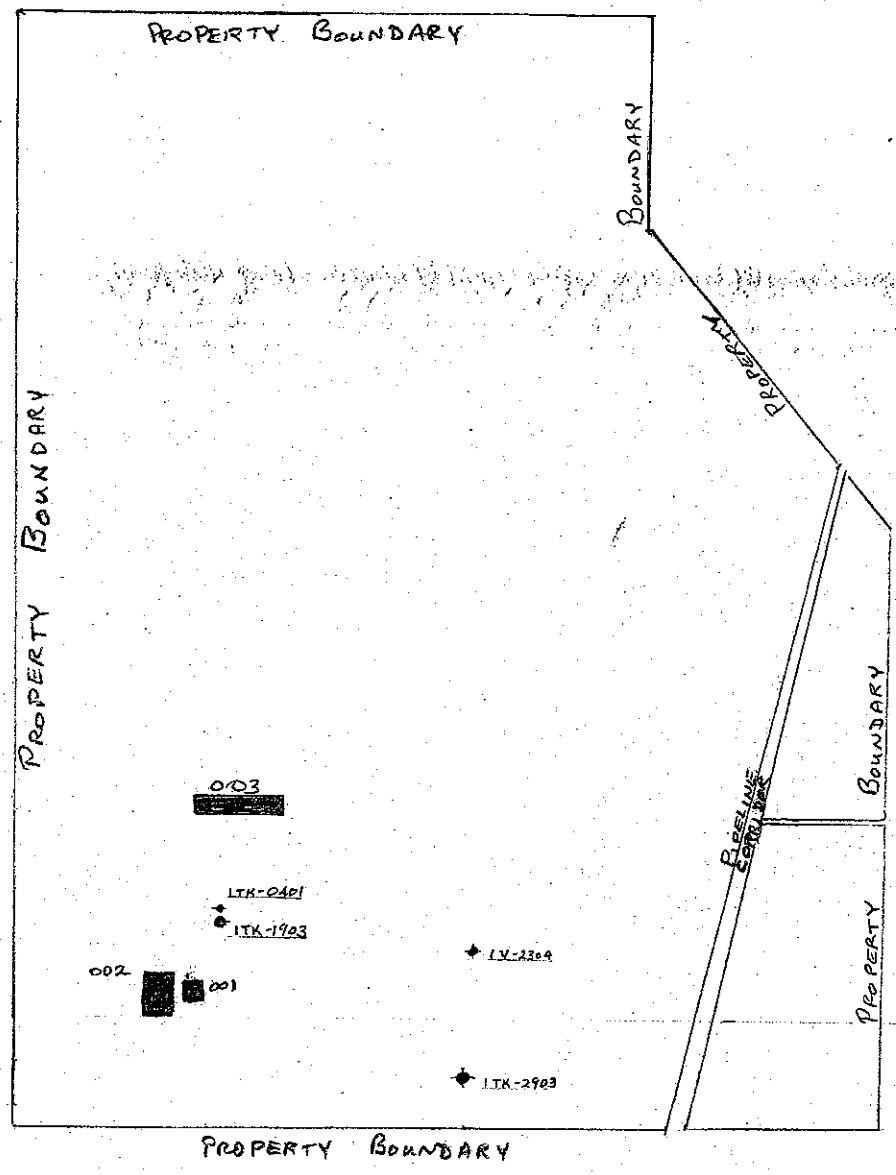
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Alfred Slatin, Vice President El Paso Polyolefins Company	Alfred Slatin	11/18/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Alfred Slatin, President Rexene Company	Alfred Slatin	11/18/80

V. FACILITY DRAWING *(see page 4)*



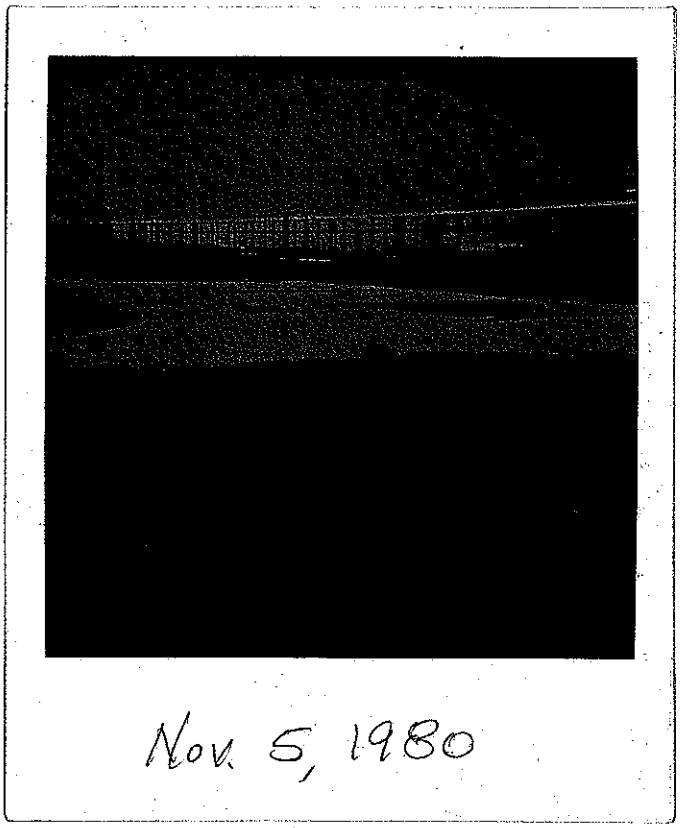
KEY

Area 001 = Fire Training Area - 100' x 100'
Area 002 = Ground Flare - 200' x 150'
Area 003 = Drum Storage Area - 450' x 100'
ITK-0401 = Waste Oil Storage Tank
ITK-1903 = Fouled Xylene Storage Tank
ITK-2903 = Fouled Naphtha Storage Tank
IV-2304 = Neutralized Organic Peroxide Storage Vessel

SCALE: 1" = 1,000'

ITEM VI

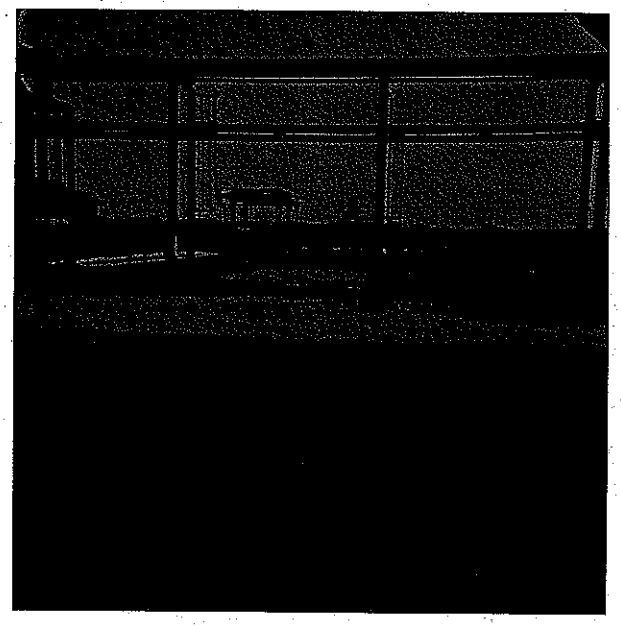
PHOTOGRAPHS



Nov. 5, 1980

FIRE TRAINING AREA

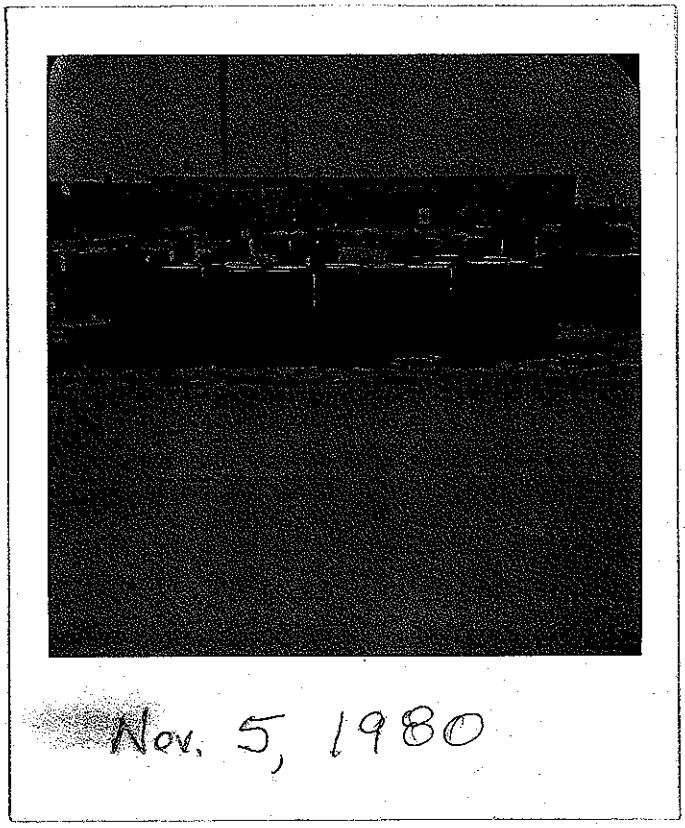
AREA 001



Nov. 5, 1980

GROUND FLARE AREA

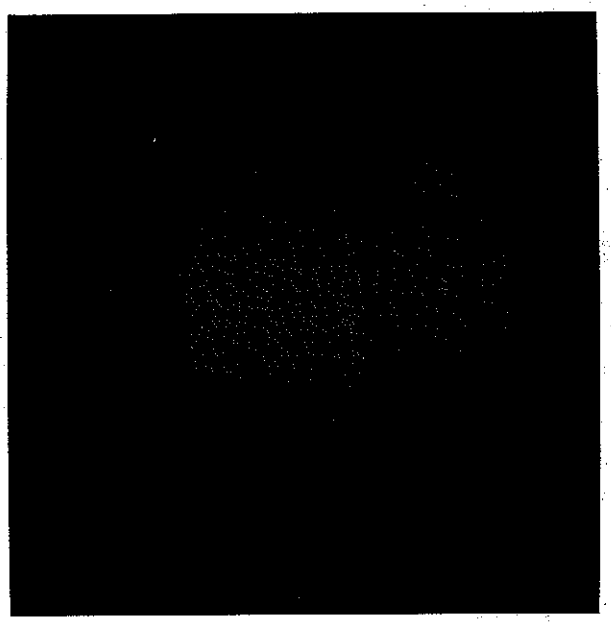
AREA 002



Nov. 5, 1980

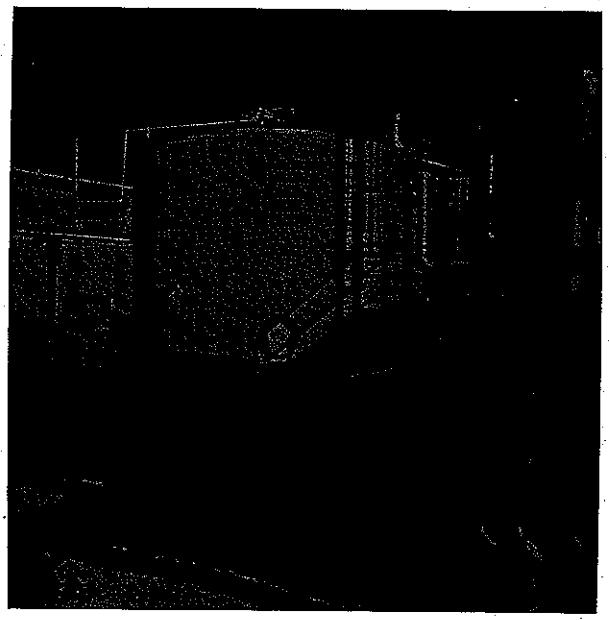
DRUM STORAGE AREA

AREA 003



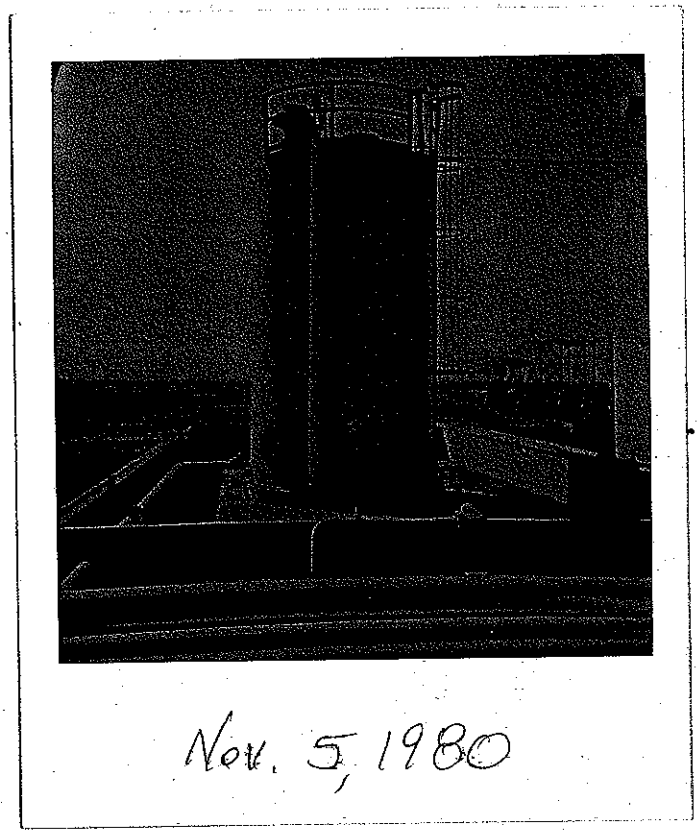
Nov. 5, 1980

WASTE OIL STORAGE
TANK, 1TK-0401



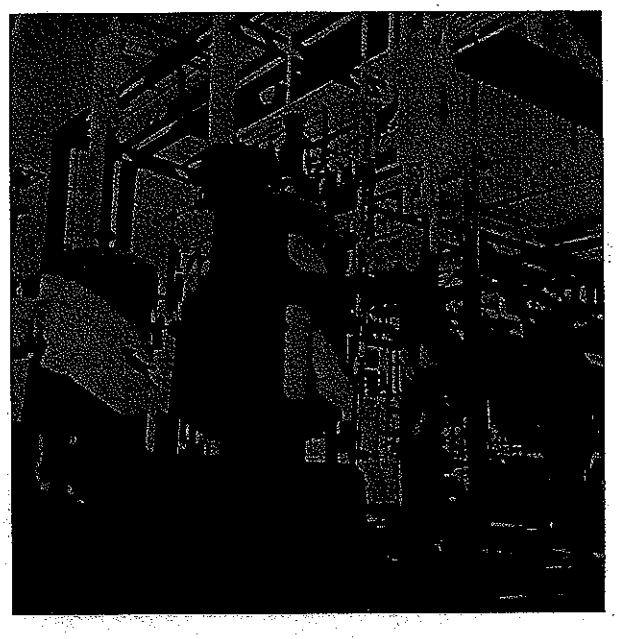
Nov. 5, 1980

FOULED XYLENE STORAGE
TANK, 1TK-1903



Nov. 5, 1980

FOULED NAPHTHA STORAGE
TANK, 1TK-2903

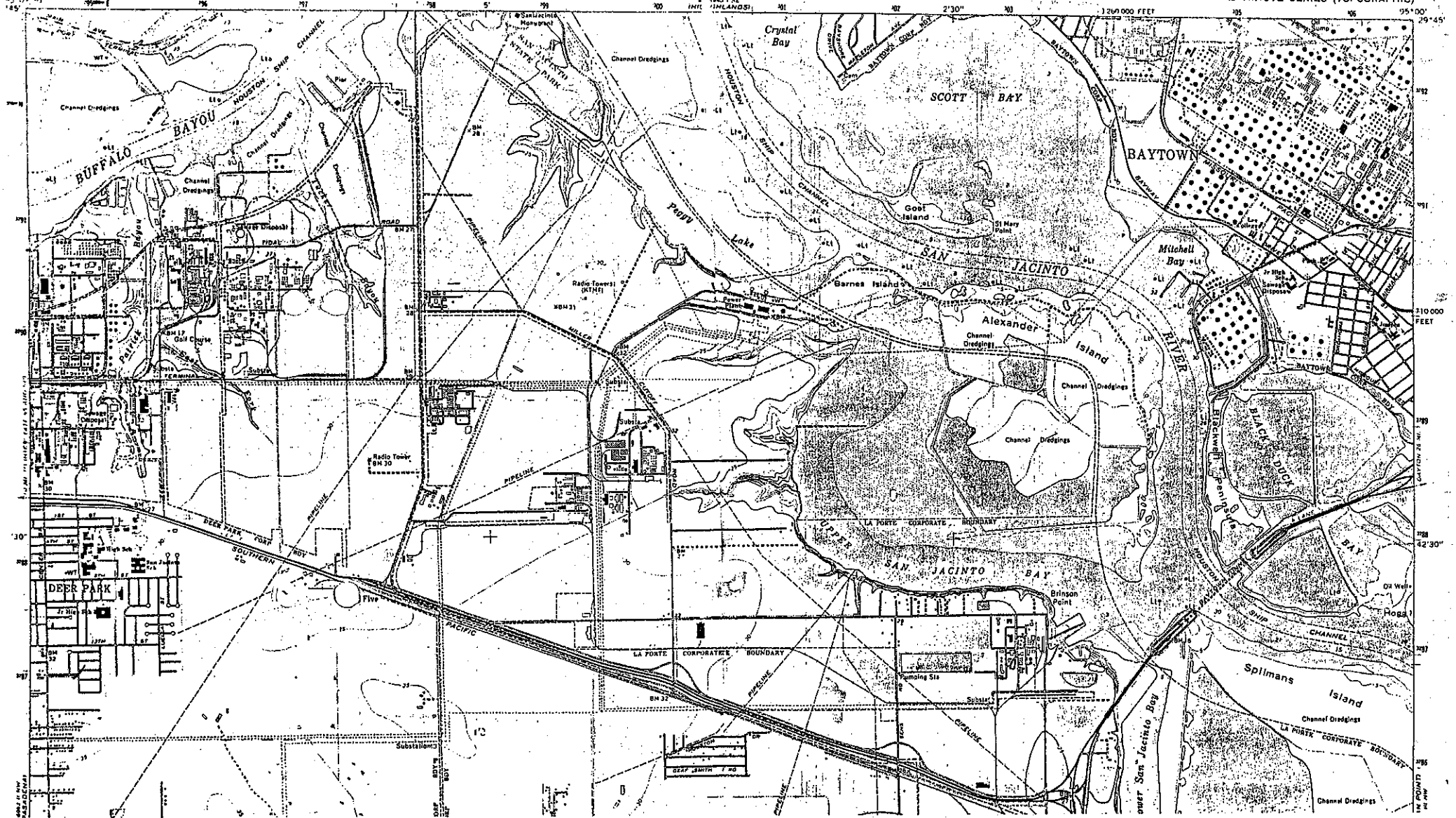


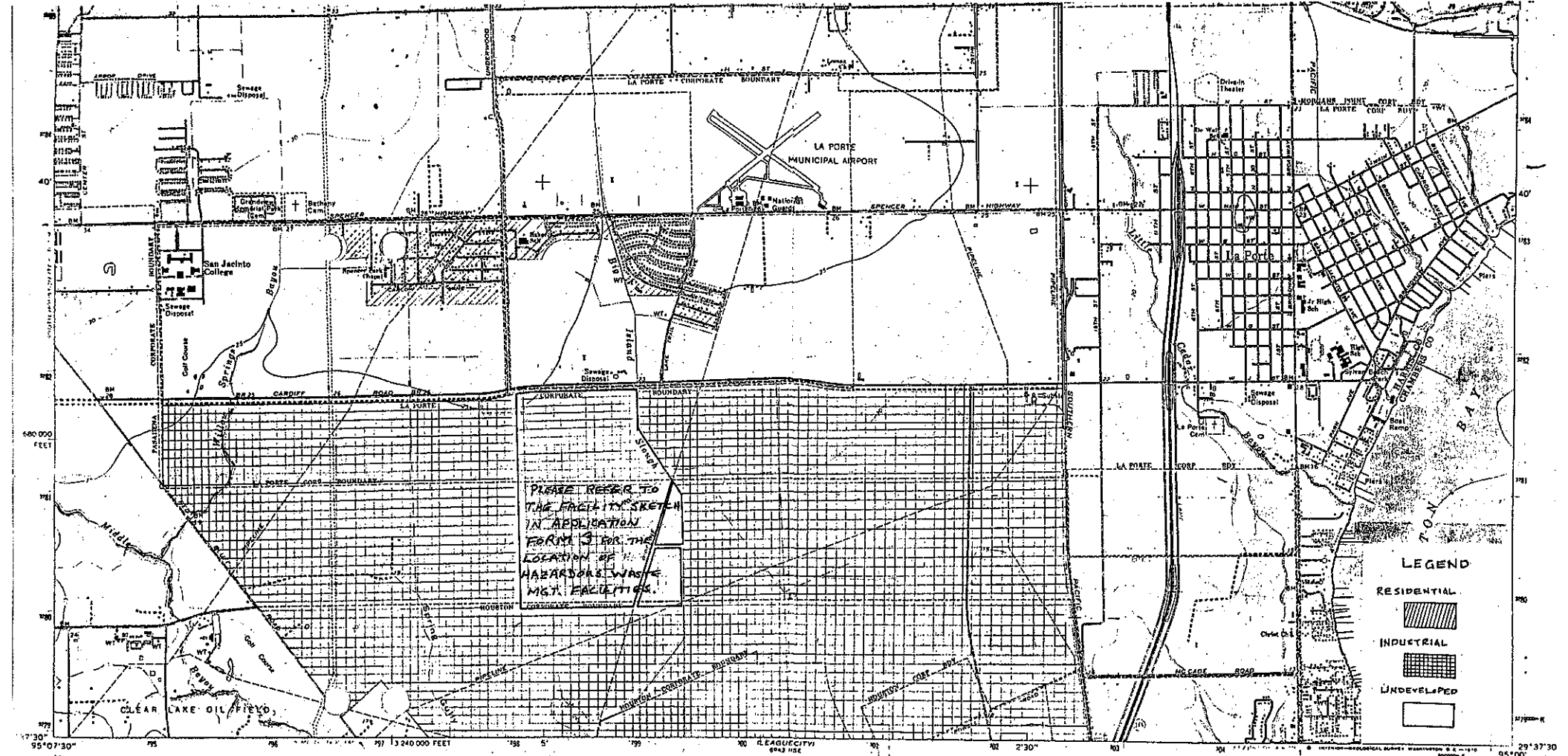
Nov. 5, 1980

NEUTRALIZED ORGANIC PEROXIDE
STORAGE VESSEL, 1V-2304

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

LA PORTE QUADRANGLE
TEXAS
7.5 MINUTE SERIES (TOPOGRAPHIC)





Mapped, edited, and published by the Geological Survey

Control by USGS, USC&GS, and USCE

Planimetry by photogrammetric methods from aerial photographs taken 1966. Topography enlarged from 1:31 680-scale AMS map of La Porte Quadrangle. Original map by planetable surveys 1943. Revised 1967

Selected hydrographic data compiled from USC&GS Charts 588-589 (1968), 1282 (1969), and from aerial photographs. This information is not intended for navigational purposes

Polyconic projection. 1927 North American datum
10,000-foot grid based on Texas coordinate system, south central zone
1000-meter Universal Transverse Mercator grid ticks, zone 15, shown in blue

Red tint indicates areas in which only landmark buildings are shown

Water stages vary in this area with meteorological conditions
Approximate limits of occasional inundation shown by dashed blue lines where mean high water is undetermined for lack of visual evidence
Dotted blue lines indicate the approximate limits of low water

UTM GRID AND 1967 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U S GEOLOGICAL SURVEY, DENVER COLORADO 80225, OR WASHINGTON, D C 20242
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

LA PORTE, TEX.
N2917.5—W9500-7.5
1967
AMS 6945 II NE—SERIES V882

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO. TXD020800371

I. NAME OF INSTALLATION [redacted]

II. INSTALLATION MAILING ADDRESS [redacted]

III. LOCATION OF INSTALLATION [redacted]

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH A

FOR OFFICIAL USE ONLY

COMMENTS:

INSTALLATION'S EPA I.D. NUMBER: TXD020800371 (T/A 3, C 1)

APPROVED:

DATE RECEIVED (yr. mo. & day): 800818

003235

I. NAME OF INSTALLATION

REXENE COMPANY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 9802 FAIRMONT PARKWAY

CITY OR TOWN: PASADENA ST: TX ZIP CODE: 77507

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 9802 FAIRMONT PARKWAY

CITY OR TOWN: PASADENA ST: TX ZIP CODE: 77507

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: THIBODEAUX, HUGH J., PLANT MGR.

PHONE NO. *(area code & no.)*: 713-474-3211

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: EL PASO POLYOLEFINS COMPANY

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only — enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.:

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

DATE

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

W | T | X | D | 0 | 2 | 0 | 8 | 0 | 0 | 3 | 7 | / | 2 | 4

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F003					
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

1. IGNITABLE (D001)	2. CORROSIVE (D002)	3. REACTIVE (D003)	4. TOXIC (D000)
X	X	X	☐

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	Plant Manager	8/13/80

EPA Form 8700-12 (6-80) REVERSE

President, Rexene Company 8/13/80
Div. of El Paso Polyolefins
Company

REXENE

REXENE COMPANY

Alfred Slatin
President

TXD020800371

August 15, 1980

EPA Region VI
Attn: 6 AEP
1201 Elm Street
First International Bldg.
Dallas, Texas 75270

Subject: RCRA Section 3001 Notification of Hazardous Waste Activity

Gentlemen:

Herewith executed Notification Form relating to Rexene Company's Bayport Polyethylene and Polypropylene Plants, concerning Hazardous Waste Activity, as required by RCRA, Section 3001.

Please be advised that as per requirements by the State of Texas, a separate report has been submitted to the State which includes additional information not currently required by EPA. You are advised of this to assure you of Rexene's cooperation in reporting completely its total waste management activities both to Federal and State Agencies.

Due to the requirement to mail this Notification by or before August 18, 1980, we are mailing this from Rexene Company's headquarters at Paramus, New Jersey, rather than from its facility at Bayport, Texas.

Very truly yours,

Alfred Slatin
President

AS:jm
Encls.

RECEIVED
AUG 18 1980
6AEP

W. 115 Century Road, P.O. Box 665, Paramus, N.J. 07652 (201) 262-6500
An Affiliate of El Paso Products Company

TXD020800371

DRAFT

SUBJECT TO REVISION

TECHNICAL SUMMARY
Permit No. HW-50066
Application No. 10745

1. El Paso Products Company has applied to the Texas Department of Water Resources (TDWR) for a permit to continue operation of an industrial solid waste management facility associated with their Bayport Polyolefins plant. The applicant's waste management operations commenced before November 19, 1980. This is an existing facility under 31 Texas Administrative Code (TAC) Section 335.2 which may continue operating until such time as the Texas Water Commission approves or denies the application.

   The industrial solid waste management facility is located on a 135.21-acre tract of land at 9802 Fairmont Parkway approximately 3.5 miles west of the intersection with State Highway 146 in the City of Pasadena, Harris County, Texas. The location is in the watershed area of Segment 1113 of the San Jacinto-Brazos Coastal Basin (North Latitude 29°38'05", West Longitude 95°05'10").

   The facility will manage wastes generated on-site. The waste management facility consists of a container storage area with a total capacity of 35,760 gallons consisting of 650 55-gallon drums and 100 half pint steel containers and four tanks with a total capacity of 68,600 gallons.

2. The waste managed at this facility is Class 1 industrial solid, including hazardous waste. The wastes are generated on -site as a result of chemical processing activities. The wastes include naptha, xylene, and isopropyl alcohol with heptane, all contaminated with polypropylene, flare condensate, soil contaminated with chromium, and organic peroxides with heptane.

3. The proposed permit is required by 31 Texas Administrative Code (TAC) Section 335.2 and 335.43. A draft permit has been prepared in accordance with applicable requirements of 31 TAC Sections 335 and 341, which have been adopted under the authority of Section 4(c) of the Solid Waste Disposal Act, Article 4477-7, Revised Civil Statutes, and Sections 5.131 and 5.132, Texas Water Code.

   In addition, the proposed permit:

   A. Establishes provisions for closure of the facility;

   B. Requires the permittee to establish and maintain financial assurance to satisfy 31 TAC Section 335.7 to provide for proper facility closure;

   C. Includes standard permit provisions and other requirements pertaining to the management of industrial solid waste, including hazardous industrial solid waste.

4. The applicant did not propose variances or alternatives to required standards.

DRAFT

SUBJECT TO REVISION

5. Before a permit is issued, amended, extended, or renewed, the TDWR will provide an opportunity for a hearing to the applicant and persons affected. Hearings are conducted by the Texas Water Commission. The draft permit will be considered by the Texas Water Commission for issuance after opportunity for public hearing is completed. Decisions are rendered by the Commission upon conclusion of the hearings and a review of the factual and legal issues presented. Decisions may be reconsidered in response to a motion for rehearing, and by appeal to a District Court in Travis County.

6. Additional information about this application may be obtained by contacting

   A. For technical information:

      James A. Feeley
      Industrial Solid Waste Section
      TDWR
      P. O. Box 13087, Capitol Station
      Austin, Texas 78711

   B. For procedural and public hearing information:

      Office of the Chief Hearings Examiner
      TDWR
      P. O. Box 13087, Capitol Station
      Austin, Texas 78711

Prepared:

Jim Feeley
Industrial Solid Waste Section

1/23

PERMIT NO. HW-50066

EPA I.D. No. TXD 020800371

TEXAS WATER COMMISSION
Stephen F. Austin State Office Building
Austin, Texas

DRAFT
SUBJECT TO REVISION

PERMIT FOR INDUSTRIAL SOLID WASTE MANAGEMENT SITE issued under provisions of TEX. REV. CIV. STAT. ANN. art. 4477-7 and Chapter 26 of the Texas Water Code

Name of Permittee:	El Paso Products Company P. O. Box 3986 Odessa, Texas 79760
Site Owner:	El Paso Products Company P. O. Box 3986 Odessa, Texas 78760
Registered Agent for Service:	C.T. Corporation System Republic National Bank Building Pacific and Ervay Streets Dallas, Texas 75221
Classification of Site:	Hazardous Waste Storage and Processing, Non-Commercial

The permittee is authorized to store and process wastes in accordance with limitations, requirements and other conditions set forth herein. This permit is granted subject to the rules of the Department and other Orders of the Commission and laws of the State of Texas. Nothing in this permit exempts the permittee from compliance with the applicable rules and regulations of the Texas Air Control Board.

This permit will be valid until cancelled, amended or revoked by the Commission except that the authorization to store and process wastes shall expire midnight, 10 years after the date of permit approval.

APPROVED, ISSUED, AND EFFECTIVE this _____ day of _____, 19___.

ATTEST: _____

_____
For the Commission

DRAFT

SUBJECT TO REVISION

NAME: El Paso Products Company

I. Size and Location of Site

A. The El Paso Products Company's Bayport Polyolefins Plant is located on a 135.21-acre tract of land at 9802 Fairmont Parkway approximately 3.5 miles west of the intersection with STate Highway 146 in the City of Pasadena, Harris County, Texas. The location is in the watershed area of Segment 1113 of the San Jacinto-Brazos Coastal Basin (North Latitude 20°38'05", West Longitude 95°05'10").

B. The site's legal description submitted with the application is hereby made a part of the permit as "Attachment A."

II. Facilities and Operations Authorized

A. Wastes Authorized:

The permittee is authorized to manage industrial solid wastes listed in the application as described herein.

Wastes are those generated from on-site sources.

Hazardous wastes are limited to those within the Hazard Code Groups indicated below:

1. Hazard Code Groups (as prescribed by the U.S. Environmental Protection Agency regulations in effect upon the date of permit approval):

x	Ignitable (I)		Acute Hazardous Waste (H)
x	Toxic (T)	x	EP Toxic (E)
x	Corrosive (C)	x	Reactive (R)

2. Waste Descriptions

Waste Descriptions	TDWR Waste Class	Hazard Code(s)
a. Waste xylene with polypropylene solids	I	I
b. Waste sodium in mineral oil	I	R
c. Waste titanium trichloride in mineral oil	I	R
d. Waste isopropyl alcohol/ heptane solvent with polypropylene	I	I
e. Flare condensate with polypropylene	I	I
f. Soil, chromate contaminated	I	E
g. Waste heptane	I	I
h. Xylene saturated polymer	I	I
i. Organic peroxide/heptane in caustic	I	I,R,C

NAME: El Paso Products Company

Waste Descriptions	TDWR Waste Class	Hazard Code(s)
j. Fouled naptha with polyethylene solids	I	I
k. Slop oils	I	E,T,I
l. Contaminated stormwater	I	E

B. Facilities and Functions Authorized:

The permittee is authorized to operate the following facility units for storage and/or processing, subject to the limitations described below. All waste management activities are to be confined to authorized facility units which shall hereafter be identified as numbered below:

1. Container storage area, maximum capacity 650 55-gallon drums and 100 half pint steel cans (total capacity 35,760 gallons) for the storage of all authorized wastes.

2. Tank, closed, maximum capacity 42,000 gallons, steel, above-grade, identified as Tank 1-TK 1903 in the application, for storage of xylene contaminated with polypropylene resin.

3. Tank, closed, maximum capacity 8,400 gallons, steel, above-grade, identified as Tank 1-TK 0401 in the application for the storage of slop oils and condensed flare hydrocarbons.

4. Tank, closed, maximum capacity 550 gallons, steel, above-grade, identified as Tank 1-V-2304 in the application for the processing of organic peroxides and heptane in caustics.

5. Tank, closed, maximum capacity 17,640 gallons, steel, above-grade, identified as Tank 1-TK-2903 in the application for the storage of naptha contaminated with polyethylene resin.

C. Authorization to continue industrial solid waste operations at this facility is contingent upon maintenance of financial assurance pursuant to Provision IV.A.

D. The facility components and operational methods authorized are limited to those described herein and by the application and related plans and specifications. All facility components and operational methods are subject to the terms and conditions of this permit and TDWR Rules. Prior to constructing or operating any facility component in a manner which differs from the related plans and specifications, the permittee is required to:

1. Notify the TDWR and submit plans and specifications for the proposed modifications;

2. Receive written authorization from the Executive Director.

E. Any proposed facility modification, addition of components, or expansion in capacity which has not been addressed by the terms of this permit must be authorized in accordance with TDWR amendment rules.

III. Facilities Design, Construction and Operation

A. Facility design, construction, and operation must comply with this permit and TDWR rules. All plans and specifications for design and operation submitted with the application are approved, subject to the terms of this permit and any other orders of the Texas Water Commission.

B. The entire waste management facility shall be designed, constructed, operated, and maintained to prevent inundation of and discharges from the areas surrounding the facility components. At a minimum, the facility shall be provided with a drainage control system that meets the following minimum requirements:

1. The drainage control system shall be constructed to collect spillage and/or incident precipitation from the area immediately surrounding the tank facility component in such a manner as to:

   a. Preclude the release from the system of any collected spills or leaks, except as provided by Provision III.B.3. This requirement shall be met by, at a minimum, providing a base and sides which are free of cracks or gaps and are sufficiently impervious to contain leaks, spills, or precipitation until the collected material is removed, and providing curbs or sides designed to withstand a full hydrostatic head;

   b. Minimize the amount of rainfall that is collected by the system;

   c. Prevent run-on into the system from non-storage and processing areas; and

   d. Provide a volumetric storage capacity which is not less than the sum of the largest tank plus the rainwater which would be collected during a 25-year, 24-hour rainfall event (9.5 in.).

2. The container storage area shall have a containment system that is capable of collecting and holding spills, leaks, and accumulated precipitation. The containment system shall:

   a. Have a base underlying the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks and spills until the collected material is detected and removed;

b. Have a base which is sloped or the containment system be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or accumulated precipitation unless the containers are elevated or are otherwise protected from contact with accumulated liquids; and

c. Having sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater.

3. Collected spills, leaks, clean-up residues, and rainfall runoff shall be removed promptly after the spillage and/or rainfall event and shall be removed in as timely a manner as is necessary to prevent overflow of the collection system, by the following method(s):

a. Removal to an authorized facility component;

b. Removal off-site for processing and/or disposal at at authorized industrial solid waste management facility; and/or

c. Discharged in accordance with a wastewater discharge permit.

C. The minimum shell thicknesses specified below shall be maintained at all times. All liners specified in the application shall be maintained intact at all times. The wastes contained in the tanks shall not exceed any maximum operating volume specified below:

Tank (Provision II.B. No.)	Minimum Shell Thickness (inch)	Maximum Operating Volume (gallons)
2	0.188	20,000
3	0.188	6,700
4	0.500	400
5	0.188	16,000

D. All pumps, fire- and spill-control equipment, decontamination equipment, air pollution control and monitoring equipment, and all other equipment and structures authorized or required by this permit shall be maintained in good functional condition.

E. All authorized facility units shall be clearly identified as numbered in Provision II.B. (e.g., 1, 2, 3). At a minimum, drum storage areas shall have signs and tanks painted labels indicating "TDWR Permitted Unit No. (as numbered in Provision II.B.)."

F. All waste must ultimately be conveyed off-site to a facility authorized to receive such waste.

IV. Closure

A. The permittee shall provide financial assurance in a form acceptable to the Executive Director of the TDWR in an amount not less than $181,000. Financial assurance shall be secured and maintained in compliance with 31 TAC Section 335.452, incorporating by reference 40 CFR Part 264 Subpart H.

B. The permittee shall submit to the Executive Director upon request such information as may be necessary to determine the adequacy of financial assurance.

C. Facility closure shall commence:

1. Upon direction of the Texas Water Commission or the Executive Director for violation of the permit, TDWR Rules, State Statutes; or

2. Upon suspension, cancellation or revocation of the terms and conditions of this permit concerning the authorization to receive, store and process waste materials; or

3. Upon abandonment of the site for more than 90 days;

4. Upon direction of the Executive Director for failure to secure and maintain an adequate bond or other financial assurance as required in Provision IV.A.; or

5. When necessary to comply with Provision VII.B.

D. Upon completion of any closure activity, the permittee must submit to the Executive Director certification by both the permittee and an independent Registered Professional Engineer that the facility or waste management unit(s) has been closed in accordance with the approved closure plan.

V. Standard Permit Conditions

A. The permittee has a duty to comply with all conditions of this permit. Failure to comply with any permit condition constitutes a violation of the permit and the Texas Water Code or the Texas Solid Waste Disposal Act, and is grounds for enforcement action, for permit amendment, revocation or suspension, or for denial of a permit renewal of application.

B. In order to continue a permitted activity after the expiration date of the permit, the permittee must apply for a new permit or renewal. Authorization to continue such activity will terminate upon the effective denial of said application.

C. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

D. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

E. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit.

F. The permittee shall furnish to the Executive Director, within a reasonable time, any relevant information which the Executive Director may request to determine whether cause exists for amending, revolving, suspending, or terminating the permit. The permittee shall also furnish to the Executive Director, upon request, copies of records required to be kept by this permit.

G. The permittee shall give notice to the Executive Director prior to physical alterations or additions to the permitted facility if such alterations or additions would require a permit amendment or result in a violation of permit requirements.

H. Written approval from the Executive Director is required before beginning any change in the permitted facility or activity that would result in noncompliance with other permit requirements.

I. Unless specified otherwise, the permittee shall report any noncompliance which may endanger health or the environment. Report of such information shall be provided orally within 24 hours from the time the permittee becomes aware of the noncompliance. A written submission of such information shall also be provided within 5 working days of the time the permittee becomes aware of the noncompliance, except as provided by Provision V.W. The written submission shall contain a description of the noncompliance and its cause; the potential danger to human health or the environment; the period of noncompliance, including exact dates and times; if the noncompliance has not been corrected, the anticipated time it is expected to continue; and, steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

J. Inspection and entry shall be allowed as prescribed in Texas Water Code, Chapter 26 and Chapter 27, and Section 7 of the Solid Waste Disposal Act, as applicable.

K. 1. Monitoring samples and measurements shall be representative of the monitored activity.

2. The permittee shall retain records of all monitoring information including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, the waste minimization certification required by §3002(d) of the Resource Conservation and Recovery Act, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, reports, certification or application.

3. Records of monitoring activities shall include the following:

   a. date, time and place of sample or measurement;

   b. individual who collected the sample or made the measurement;

   c. date of analysis;

   d. the individual who made the analysis;

   e. the technique or method of analysis; and

   f. the results of the analysis.

L. Any noncompliance other than that specified above, or any required information not submitted or submitted incorrectly, shall be reported to the Executive Director as promptly as possible.

M. This permit may be transferred only according to the provisions of 31 TAC Section 341.235 (relating to Transfer of Permits) and 31 TAC Section 341.270 (relating to Action on Application for Transfers).

N. All reports and other information requested by the Executive Director shall be signed by the person and in the manner required by 31 TAC Section 341.317 relating to Signatories to Reports.

O. This permit may be amended, suspended and reissued, or revoked for cause. The filing of a request by the permittee for a permit amendment, suspension and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

P. This permit does not convey any property rights of any sort, or any exclusive privilege.

Q. Monitoring results shall be provided at the intervals specified elsewhere in this permit.

R. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Austin Office of the Department no later than 14 days following each schedule date.

S. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in an application or in any report to the Executive Director, it shall promptly submit such facts or information.

T. The permittee need not comply with the conditions of this permit to the extent and for the duration such noncompliance is authorized in an emergency order issued by the Commission.

U. For a new facility, the permittee shall not commence storage, processing or disposal of solid waste; and for a facility being modified, the permittee shall not process, store or dispose of solid waste in the modified portion of the facility, until:

1. The permittee has notified the local TDWR District Office and submitted to the Executive Director by certified mail or hand delivery a certification prepared and sealed by a professional engineer with current registration pursuant to the Texas Engineering Practice Act, and signed by the permittee. Required certification shall be in the following form:

   This is to certify that construction of the following facility components authorized or required by TDWR Permit No. HW-50066 has been completed, and that construction of said facilities has been performed in accordance with and in compliance with the design and construction specifications of Permit No. HW-50066:

   (Description of facility components with reference to applicable permit provisions), and

2. The Executive Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or within 15 days of submission of the letter required by Provision V.U.1., the permittee has not received notice from the Executive Director of an intent to inspect, prior inspection is waived and the permittee may commence processing, storage or disposal of solid waste.

V. The following shall be included as information which must be reported orally within 24 hours pursuant to Provision V.I.:

1. Information concerning release of any solid waste that may cause an endangerment to public drinking water supplies.

2, Any information of a release or discharge of solid waste, or of a fire or explosion from a facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

a. name, address, and telephone number of the owner or operator;

b. name, address, and telephone number of the facility;

c. date, time and type of incident;

d. name and quantity of material(s) involved;

e. the extent of injuries, if any;

f. an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and

g. estimated quantity and disposition of recovered material that resulted from the incident.

W. The Executive Director may waive the five-day written notice requirement as specified in Provision V.I. in favor of a written report submitted to the Department within 15 days of the time the permittee becomes aware of the noncompliance condition.

X. The permittee shall prepare an annual report required under 31 TAC 335.71. This annual report shall be submitted to the Department on or before January 21 of each calendar year following the effective date of this permit.

Y. Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in Section 1.03 of the Texas Clean Air Act or violate Section 4.01 of the Texas Clean Air Act, Article 4477-5, V.A.T.S. If the Executive Director of the Texas Air Control Board determines that such a condition or violation occurs, the permittee shall implement additional abatement measures as necessary to control or prevent the condition or violation.

Z. The permittee shall certify, no less than annually, that it has a program in place to reduce the volume and toxicity of hazardous waste that it generates to the degree determined by the permittee to be economically practicable; and the proposed method of treatment, storage or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment.

AA. The permittee shall notify the Department of any release of hazardous waste or constituents that may have occurred from any solid waste management unit at the facility regardless of when the release occurred or may have occurred, any regardless of when waste was placed in any unit. Release of hazardous waste or constituents from any solid waste management unit regardless of when waste was placed in that unit or when the release occurred, will constitute grounds for: (1) a major permit amendment pursuant to §4(e)(8), Solid Waste Disposal Act, Art. 4477-7 V.T.C.S., as necessary to incorporate into the permit appropriate corrective action; (2) the adoption by the Commission of a ground-water compliance plan; or (3) other action deemed necessary by the Department. Pursuant to such permit amendment, ground-water compliance plan, or other order or action, the permittee shall then take timely corrective action for such releases.

BB. 1. Six months from the effective date of this permit, the permittee shall:

a. Examine all solid waste management units at the facility for evidence of releases as defined by §101(22) Comprehensive Environmental Response, Compensation and Liability Act 42 USC 9601;

b. Identify any releases of hazardous wastes or constituents from any solid waste management units regardless of when waste was placed in that unit; and

c. Prepare and submit to the Department, along with all evidence of releases a corrective action plan for recovery of all released material and/or to mitigate any identified releases as necessary to protect human health and the environment.

2. The permittee must secure adequate financial assurance for the implementation of the approved corrective action plan.

VI. Incorporated Regulatory Requirements

A. The following Texas Department of Water Resources regulations are hereby made provisions and conditions of this permit:

1. 31 TAC Section 335.453;

2. 31 TAC Section 335.454; and

3. 31 TAC Section 335.455.

B. To the extent applicable to the activities authorized by this permit, the following provisions of 40 CFR Part 264, adopted by reference at 31 TAC Section 335.452, are hereby made provisions and conditions of this permit, except as otherwise provided in 31 TAC Sections 335.12, 335.15, and 335.453-335.455, and to the extent consistent with the Solid Waste Disposal Act, Article 4477-7, Revised Civil Statutes, and the Rules of the Texas Water Development Board:

1. Subpart B -- General Facility Standards;

2. Subpart C -- Preparedness and Prevention;

3. Subpart D -- Contingency Plan and Emergency Procedures;

4. Subpart E -- Manifest System, Recordkeeping, and Reporting;

5. Subpart G -- Closure and Post-closure;

6. Subpart H -- Financial Requirements;

7. Subpart I -- Use and Management of Containers;

8. Subpart J -- Tanks; and

9. Subpart O -- Incinerators.

VII. Incorporated Application Materials

A. Contingency Plan

The permittee shall follow the contingency plan developed in accordance with 40 CFR Part 264 Subpart D, dated June 22, 1984 which is hereby approved subject to the terms of this permit and any other orders of the Texas Water Commission. The contingency plan is hereby incorporated into this permit by reference as if set out fully herein. Any and all revisions to the plan shall become provisions and conditions of this permit upon the date of approval by the Commission.

B. Closure Plan

Facility closure shall be completed in accordance with the requirements of 31 TAC Section 335.452 and 40 CFR Part 264 Subpart G and the closure plan dated June 22, 1984 which is hereby approved subject to the terms of this permit and any other orders of the Texas Water Commission. The closure plan is hereby incorporated into this permit by reference as if set out fully herein. Any and all revisions to the plan shall become provisions and conditions of the permit upon the date of approval by the Commission.

NAME: El Paso Products Company

DRAFT

SUBJECT TO REVISION

C. Inspection Schedule

The permittee shall follow the inspection schedule developed in accordance with 40 CFR Part 264.15 dated June 22, 1984 which is hereby approved subject to the terms of this permit and any other orders of the Texas Water Commission. The inspection schedule is hereby incorporated into this permit by reference as if set out fully herein. Any and all revisions to the schedule shall become provisions and conditions of this permit upon the date of approval by the Commission.

A tract of land containing 135.21 acres, more or less, located in the George B. McKinstry League, A-47, Harris County, Texas being more particularly described as follows (All bearings referenced to the Texas Coordinate System, South Central Zone):

Beginning at the Southwest corner of that certain Tract one described in Deed dated March 14, 1974 and recorded in Film code 103-11-868, which corner is called Rod 2770;

Thence N01° 56' 03" W a distance of 1650 feet;

Thence N88° 03' 59" E a distance of 3850 feet more or less to the East line of said Tract one;

Thence S15° 06' 49" W a distance of 1780 feet more or less to the South line of said Tract one;

Thence S88° 03' 59" W 3289 feet the point of the beginning.

INCORPORATED APPLICATION MATERIALS

El Paso Products Company

Table of Contents

SUPPLEMENTARY PROVISIONS FOR HANDLING HAZARDOUS WASTE

CONTINGENCY PLAN

This section is not meant to supersede or nullify the SPCC plan, but rather to supplement it with specifics regarding hazardous waste handling during an emergency. As required by law, a hazardous waste contingency plan must be prepared describing the actions facility personnel must take in response to fires, explosions or any release of hazardous wastes or constituents to air, soil or surface wastes at the facility. This plan must be designed to minimize hazards to human health or the environment. Immediate response to the hazardous waste emergency must be carried out according to the provisions of this plan.

The emergency coordination of this plan will be the responsibility of the Plant Manager or his acting representative. During hours when the Plant Manager is off-site, the Shift Supervisor (while acting in the Plant Manager's place) will coordinate the emergency and should contact the Plant Manager or, if unavailable, the acting Plant Manager, Production Manager, Technical Manager, or Maintenance Manager in that order to assume responsibility to coordinate the hazardous waste emergency.

The following personnel are authorized to act as emergency coordinator with ultimate responsibility moving up the list as soon as that person is available to respond to the emergency.

Ken W. Clower — Home Phone: 713/480-7384
Manufacturing Director
15442 Woodhorn Dr., Houston, Tx. 77062

Gerry D. Jones — Home Phone: 713/488-2615
Production Manager
16015 Stonehaven, Houston, Tx. 77059

Todd M. Carver — Home Phone: 713/488-6744
Technical Manager
15907 Mill Point, Houston, Tx. 77059

Donald J. Schelfhout — Home Phone: 713/486-8931
Maintenance Manager
3715 Lonniewood, Houston, Tx. 77059

Shift Supervisors will act as emergency coordinator until relieved. All of the above have office phone numbers at 713/474-3211.

The following duties that must be performed by the emergency coordinator in the event of fire, explosions or any release of hazardous material that could endanger human health or the environment:

1) Have the alarm sounded by calling 155 on the phone system. The guard will announce the type of emergency over the public address system. Control Room Operators will perform this function on off-hours of the guard. Taking instruction from the emergency coordinator; the guard or operator will contact the following as needed and requested by the emergency coordinator or acting coordinator:
   A. Emergency equipment needed immediately; ambulance, outside medical assistance, Life Flight helicopter, etc.
   B. The Plant Manager if not presently on site. (See above for phone number.)
   C. Next level of authority if Plant Manager is unavailable.
   D. Sheriff's Dispatcher for road blocks (barricades, etc.). (Must give plant where emergency is located, type of emergency - fire, major gas leak, etc.)
   E. Request for Channel Industries Mutual aid to stand by or provide assistance as directed.

K. W. Clower - Mfg. Dir.	Phone 713/480-7384
G. D. Jones - Prod. Mgr.	Phone 713/488-2615
T. M. Carver - Tech. Mgr.	Phone 713/488-6744
D. J. Schelfhout - Maint. Mgr.	Phone 713/486-8931

Ambulance

Clear Lake Emergency Corp.	Phone 713/488-0022
La Porte Ambulance Service (Police Dispatch)	Phone 713/471-2141
Pasadena - Bayshore Hospital	Phone 713/944-6666

Physicians

Dr. George Rice	Phone 713/944-1242
Dr. Gordon Sock	Phone 713/944-0225
Harris County Sheriff	Phone 713/221-6000
Life Flight Helicopter Service	Phone 713/797-4357

2) Determine the extent of assistance needed as directed above, identify the source, amount, type and extent of any hazardous material released and assess possible hazards to human health and/or the environment. The following will be of help for the various waste handling areas.

A. Drum Storage Area

Hazard - This area probably represents the most problem in assessing hazards as contents are constantly changing. While normally no material stored in this area requires more than safe handling, in the event of fire, irritating or asphyxiating gases and fumes could be generated. While quantities are usually so small that little danger would exist off company property, it should be considered by the Emergency Coordinator and if necessary an evacuation by the Sheriff's Department can be requested. Plant personnel have protective equipment available to combat the emergency located just outside the control room. Normally no problem with containment of waste is expected, but releases to surface water from fire hoses should be minimized.

Drum Storage Inventory by contents and drum number are kept in the Production Supervisor's office and copied in the Technical Department files. These records can assist in identifying types and amounts of waste. Shipping Tickets (hazardous waste) are kept in the Technical files and will indicate recent shipments to be deleted from lists.

B. Waste Oil Storage (1TK-0401)

Hazard - Normally would expect any emergency to be fire with small chance of explosion with dense smoke possibly being liberated due to incomplete combustion. Containment

by dike is adequate (See Engineering Report). Danger of fire spreading to fouled Xylene tanks TK-1903 should be considered. Monitor nozzles from fire system can blanket this area. Daily inspection sheets in Production files will help estimate quantity.

C. Fouled Xylene Storage (1TK-1903)
Essentially all the comments that apply to (B) above apply here also. Chances increase for dense, irritating smoke in case of fire.

D. Reactor Burn Pit
The unit has been operated sufficiently to gain a degree of confidence that when used in an emergency situation it will perform as designed with no problems. However, releases must be controlled to avoid releasing a large quantity of gas with the pilot light out which could possibly cause an aerial explosion or release excess hydrocarbon to the atmosphere.

E. Peroxide Catalyst Neutralization
The only foreseeable hazard would be the rupture of the tank with a release of caustic endangering personnel. Any releases can be checked with pH paper and if between 6 and 9 pH can be water washed into our chemical sewer system.

F. Thermal Incineration Area
This area had many possibilities for hazards and was closed down for this reason. Area has not been used for two years and is in the process of being closed. No further use is authorized.

G. Naphtha Storage Tank
Essentially all the comments that apply to (B) above apply here also. Chances increase for dense, irritating smoke in case of fire.

3) Determine if the facility has had a release, fire or explosion that could threaten health or the environment outside the facility; he must notify local authorities if he feels that evacuation is required and be available to assist officials in their decisions on evacuating.

In addition, he must immediately notify the TDWR District Supervisor giving his name and telephone number, name and address of facility; time and type of incident (e.g., release, fire), name and quantity of material involved as well as is known; the extent of injuries if any; the possible hazards to human health, or the environmentment outside the facility.

Outside facility evacuations should be handled through the Harris County Sheriff's Office dispatcher - Phone 713/221-6000. Notice of hazardous releases requiring evacuation should be made to:

A. EPA Region VI
Interfirst Two Bldg.
1201 Elm Street
Dallas, Texas 75270
Phone 214/767-2720
214/767-2666 (24-hour emergency no.)

B. TDWR District 7
4301 Center St.
Deer Park, Tx. 77536
Phone 713/479-5981

C. Harris County Pollution Control-Phone 713/920-2831
107 N. Munger
Pasadena, Tx. 77506

D. TACB
5555 West Loop, Suite 300
Bellaire, Tx. 77401
Phone 713/666-4964

4) If an emergency is in progress, the emergency coordinator must assure by taking all reasonable measures that fires, explosions and releases of hazardous waste do not occur, recur or spread to other wastes at the facility. These measures must include stopping of operations, collecting and containing of any released waste, and removal of waste.

Because of their isolation from each other and the rest of the processing area the above applies primarily to the Fouled Xylene tank and the waste oil tank which are at the end of the processing area and close to each other. Dikes on these two will contain any tank ruptures and common fire monitors would fight fire or cool either tank not burning.

If operations are stopped due to a fire, explosion or release of hazards, the emergency coordinator must monitor the waste areas for leaks, pressure build up, gas generation or ruptures in the hazardous waste areas if appropriate. Again, this would apply primarily to the Xylene and oil tanks due to their proximity to each other and the rest of the operating area.

5) After an emergency, the emergency coordinator must provide for safe storing, processing or disposing of recovered waste, contaminated soil and surface waste that was generated as the result of the emergency.

Most material would be drummed and entered into the drum storage area. If the emergency had occurred in this area, redrumming with new drums may be required.

In the Xylene or waste oil areas a "sucker" truck would probably need to be called for picking up liquids for disposal. Any contaminated soil would be placed in drums for safe disposal.

The peroxide neutralization area should be neutralized with dilute acid, preferrably acetic, and after pH is in the 6 - 9 range should be flushed to the chemical sewer system.

No waste is stored in the reactor burn pit and open controlled incineration areas. The open controlled incineration area is inactive and in the process of being closed.

In the drum storage area where different kinds of waste are stored, the emergency coordinator must ensure that no incompatible wastes are stored or combined together.

If operations were required to be stopped during the emergency, all emergency equipment must be clean and fit for reuse before operations can be resumed. (Equipment is listed in II. C. 4 - page 10 of the Part B permit application and located on a separate drawing SK-4-84-1 in the Engineering section III. A. 2. k of the same application.) Notification must be made to TDWR that all equipment is fit for reuse before operations startup may commence.

6) The emergency coordinator or the company environmental regulatory affairs group must enter any incident that requires implementation of the contingency plan in the operating record the time, date and details of the incident on behalf of the owner and report to TDWR District 7 within 15 days with a written report of the incident. This report must include:

A. Name, address and telephone number of the owner or operator;
B. Name, address and telephone number of the facility;
C. Date, time and type of incident (e.g., fire, explosion);
D. Name and quantity of materials involved;
E. The extent of injuries, if any; potential hazards to human health or the environment, where this is applicable; and
G. Estimated quantity and disposition of recovered material that resulted from the incident.

7) Evacuation Plan

The law requires that the contingency plan must include an evacuation plan where there is a possibility that evacuation could be necessary for releases of hazardous waste or fire.

At the current time there is no foreseeable reason that evacuation would be necessary to avoid hazardous waste emergencies. In fact, withdrawing to a safe location on the property and controlling the emergency will help safeguard health and environment better than having outsiders who are unfamiliar with the area and equipment attempt to do the job after the emergency has been left unattended for some time.

While danger of fire and explosions from hazardous wastes exist, there are no greater, if as great, as those in the processing areas. All hazardous waste areas are isolated as much as possible, equipped to self-handle foreseeable emergencies with fire monitors, dikes, etc., and have the minimum quantity of waste stored in place or none at all. Only three hazardous waste areas have stored material that would normally burn, (drum storage, slop oil and Fouled Xylene) and quantities

are kept to a minimum. The Reactor Burn Pit is set up for burning large gas releases by remote control and even if the remote control system should fail in the dump position, manual controls could contain releases to manageable quantities if evacuation had not occurred.

Plans will therefore be to use the provided emergency equipment and stay and control the emergency.

EL PASO PRODUCTS COMPANY - BAYPORT, TEXAS

CLOSURE PLAN

POLYETHYLENE PLANT

Reference: TDWR 156.22.13.001-.006

Basic Premise

The Polyethylene Plant has been shut down since 1982. The decision to either restart, sell or dismantle the plant has not been made. The plant is retained in a generally operable condition. The only Polyethylene Plant hazardous waste facility to be closed is the Fouled Naphtha Solvent Storage Tank. Some Naphtha remains stored at this facility as long as operation remains a possibility.

I. Fouled Solvent Storage Tank

Fouled solvent will either be disposed of by a Class I facility or sold for reclaiming/recycling. The tank will be steamed and water washed for decontamination. The water wash will continue with decanting in place until no organic phase occurs. Then the remaining water will be sent to the API separator for disposal at GCWDA.

II. Peroxide Neutralization Tank

This tank is currently being used in Polypropylene processing, even though Polyethylene is shut down. The contents of this tank after neutralization go to the chemical sewer and then to GCWDA. The tank will be water washed and steamed for decontamination.

Estimated Cost of Closure: +$3,300

EL PASO PRODUCTS COMPANY - BAYPORT TEXAS

CLOSURE PLAN

POLYPROPYLENE PLANT

Reference: TDWR 156.22.13.001-.006

Basic Premise

The Polypropylene Plant is a manufacturing plant, and as such will have an extended life. There are no plans at this time to partially or totally close this facility. During normal operations the maximum inventory of wastes in storage is 400 gallons of neutralized peroxide, 20,000 gallons of fouled solvent, and 25 empty catalyst drums awaiting re-processing.

In the event of closure, processing vessels will be washed with solvent, and then water flushed or hydroblasted. Storage tanks will be generally water washed or hydroblasted. The water used in these procedures will be either removed by outside contractors or drained to the chemical sewer. The estimated time for total plant closure is two months. A list of systems to be treated at closure is shown below.

I. Fouled Xylene Solvent Storage

Flush with solvent - water wash. Fouled Xylene solvent will either be reclaimed or sent to a Class I disposal site. The tank will be steamed and water washed for decontamination. After no more oil phasing occurs, the water will be discharged to the API pit and thence to GCWDA.

Estimated Cost of Treatment: $3,300

EL PASO PRODUCTS COMPANY - BAYPORT, TEXAS

CLOSURE PLAN

POLYETHYLENE AND POLYPROPYLENE PLANT UTILITIES

Reference: TDWR 156.22.13.001-.006

The Polyethylene and Polypropylene Plants are manufacturing plants, and as such should have an extended life. There are no plans at this time to partially or totally close this facility. During normal operation there are no hazardous wastes in the utility area.

In the event of closure, the vessels containing hydrocarbons (mainly fuel oil) and their associated equipment will be washed with water. The water flush will be removed by outside contractors until it is feasible to flush the equipment to Gulf Coast Waste Disposal Authority. The estimated time for utilities closure is two weeks. A list of systems to be treated at closure is shown below:

I. Slop Oil Tank

This tank is only hazardous due to flash point. The tank contents will either be sold to a licensed reclaimer or disposed at a Class I disposal facility. The tank will be steamed and water washed for decontamination. After no more oil phasing occurs, the water will be discharged to GCWDA via the chemical sewer.

II. Hazardous Waste Drum Storage Slab

All drums will be shipped to licensed disposer at closure. Then the slab, sump and separator will be washed and decontaminated. Equipment that cannot be adequately decontaminated will be removed and disposed via a licensed disposer.

Estimated Cost of Treatment: $12,100

General Inspection Requirements

a. Inspection Schedule

1. Daily

Waste Storage Tanks	Tank Integrity Secondary containment dike integrity Spills or leaks Leaking pumps and piping Tank overflow prevention equipment operation Tank gauge readings Liquid Levels in tanks

2. Weekly

A. Waste Storage Tanks	Area around each tank for signs of leakage Tank materials for signs of corrosion and leaks All waste transfer equipment and piping for leaks and signs of corrosion
B. Container Storage area	Leaking and/or deteriorating drums Integrity of containment

3. Monthly

Safety and Emergency Equipment	Operational readiness

4. Annually

Tanks	Structural integrity and shell thickness as indicated in inspection sheets following

b. The permittee shall record the results of facility inspections in an inspection log. At a minimum, the inspection log shall:

1. Include a description of each waste management facility component listed above, including the TDWR Permit Unit Number as applicable, and the items associated with each component;

2. Include the date, time, and inspector's name;

3. Include a notation of the observations made and the date and nature of any repairs or remediation conducted pursuant to the inspection; and

4. Be maintained at the facility for at least three (3) years after the date of the inspection.

TANK INSPECTION - ANNUAL

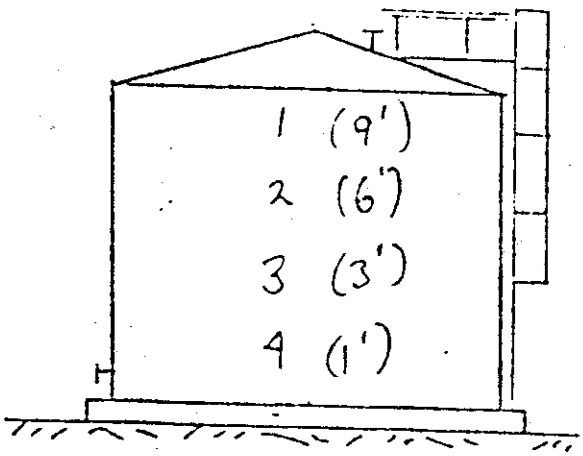
Tank No. TK-0401 Service SLOP OIL STORAGE Size 12'ϕx10'

VISUAL CONDITION

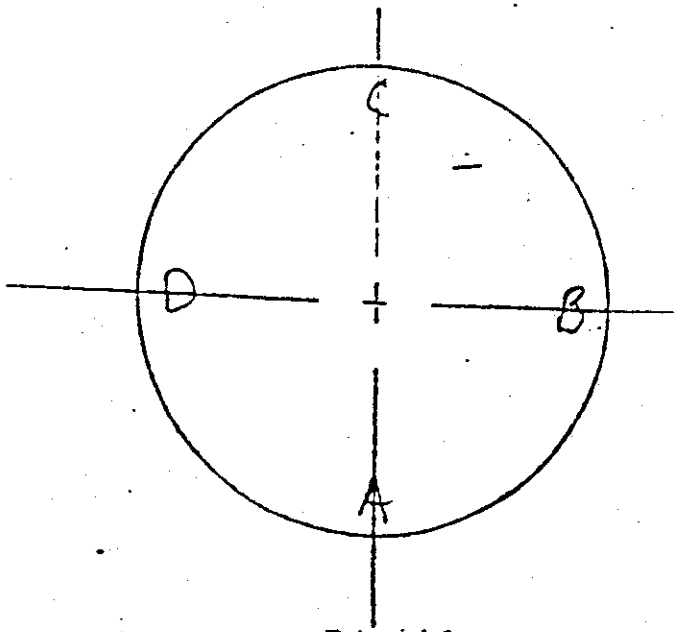
Anchor Bolts ____
Paint ____
Nozzles ____
Weld Pads ____
Stairs ____
Platform ____
Instruments: ____
Level ____
Press. ____
Temp. ____

PSV ____
Design Press. ____
Set Press ____
Last Date ____
Insulation ____
Thick ____
Type ____
Cond. ____
____
____
____

Insp.Date ____ By: ____



Elevation



Plan
Show North Arrow

No	(t)	Location	No.	(t)	Location
A1			C1		
A2			C2		
A3			C3		
A4			C4		
B1			D1		
B2			D2		
B3			D3		
B4			D4		

TANK INSPECTION

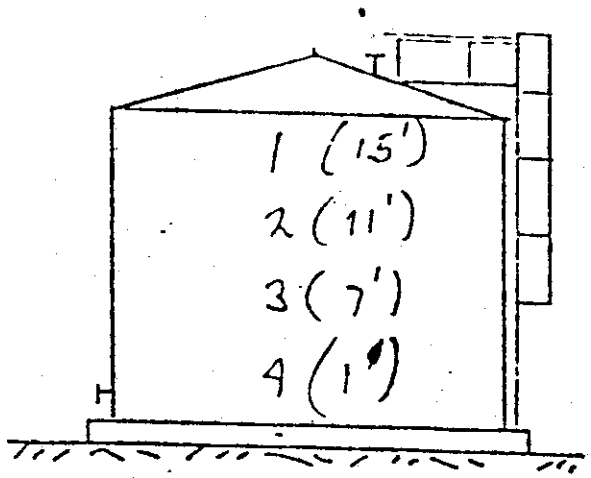
Tank No. TK-1903 Service FOULED XYLENE Size 21'-6" ϕ x 16'-2"

VISUAL CONDITION

Anchor Bolts
Paint
Nozzles
Weld Pads
Stairs
Platform
Instruments:
Level
Press.
Temp.

PSV
Design Press.
Set Press
Last Date
Insulation
Thick
Type
Cond.

Insp.Date By:



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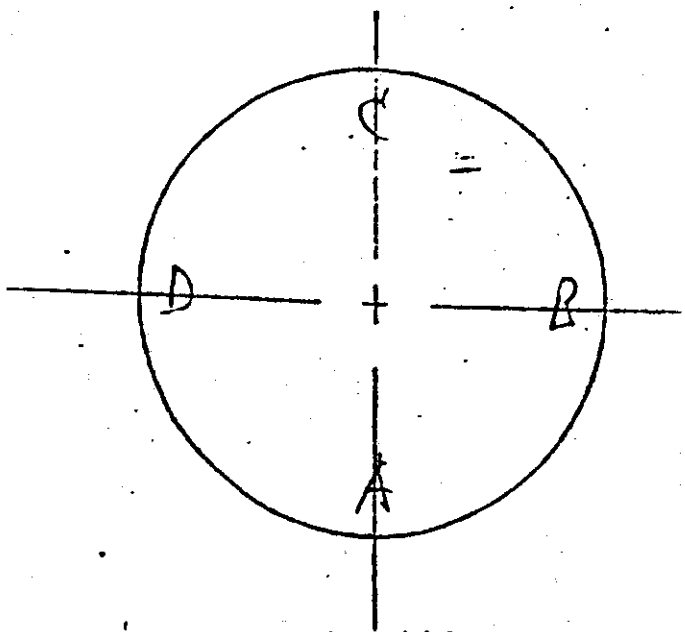
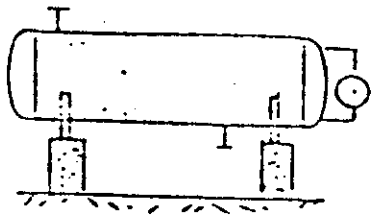


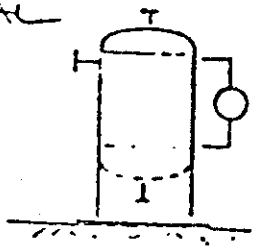
Plan
Show North Arrow

No	(t)	Location	No.	(t)	Location
A1			C1		
A2			C2		
A3			C3		
A4			C4		
B1			D1		
B2			D2		
B3			D3		
B4			D4		

INSPECTION

Vessel No. V230d Service WATER DISPOSAL Size 48" x 4'





FOUNDATION

Concr. ___ Steel ___ Skirt ___ Legs ___

VISUAL CONDITION

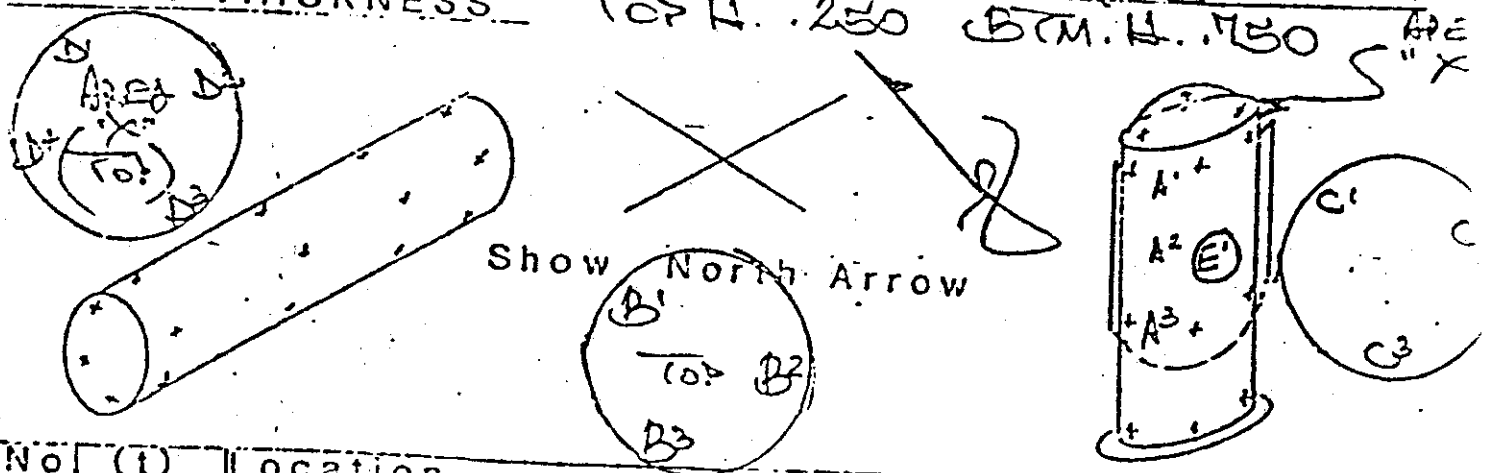
Anchor Bolts ___
Paint ___
Nozzles ___
Weld Pads ___
Stairs ___
Platform ___
Instruments: ___
Level ___
Press. ___
Temp. ___

PSV ~~#~~ NONE (SERVICE)
Design Press. 50
Set Press ___
Last Date ___
Insulation ___
Thick ___
Type ___
Cond. ___

Insp.Date ___ By: ___

BUILT 1977 JACKET .250 VESSEL .625

SHELL THICKNESS TOP H. .250 BTM. H. .750



No	(t)	Location	No.	(t)	Location
A1		JACKET NW SIDE	D1		AREA "X"
A2			D2		
A3			D3		
		TOP	D4		
B1					
B2					
B3					WEST SIDE NEXT TO TK
C		BOTTOM			

TANK INSPECTION

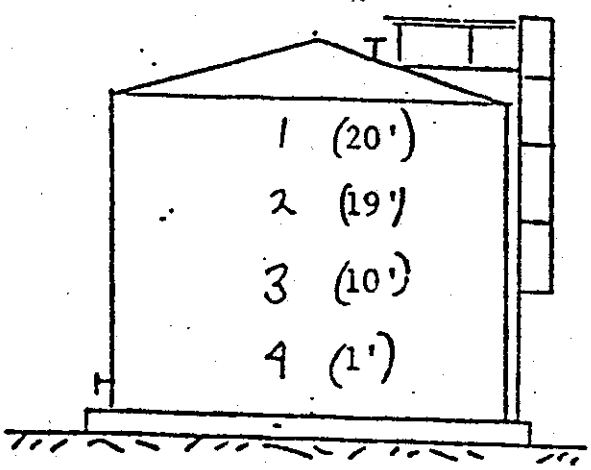
Tank No. 1 TK 2903 Service Fouled Naphtha Storage Size 12'6" X 10'

VISUAL CONDITION

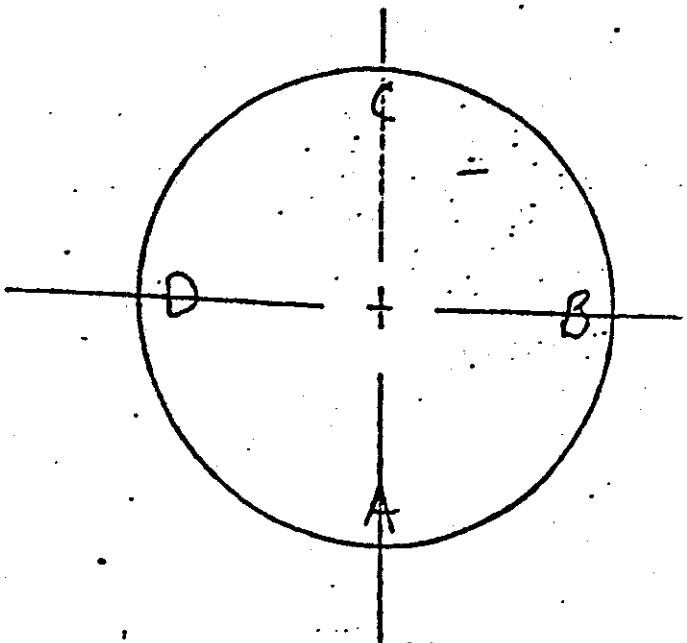
Anchor Bolts ____
Paint ____
Nozzles ____
Weld Pads ____
Stairs ____
Platform ____
Instruments: ____
Level ____
Press. ____
Temp. ____

PSV ____
Design Press. ____
Set Press ____
Last Date ____
Insulation ____
Thick ____
Type ____
Cond. ____

Insp.Date ____ By: ____



Elevation



Plan
Show North Arrow

No	(t)	Location	No.	(t)	Location
A1			C1		
A2			C2		
A3			C3		
A4			C4		
D1					

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

July 27, 1981

Rexene Co-Bayport Plant
Attn: Hugh Thibodeaux
9802 Fairmont Parkway
Pasadena, Texas 77507

EPA ID NUMBER: TXD 02 080 0371

FACILITY LOCATION: 9802 Fairmont Parkway
Pasadena, Texas

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities and the types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please contact Dwight Corley at (214) 767-2765, or write Mail Code 6E-P, 1201 Elm Street, Dallas, Texas 75270.

Sincerely,

Diana Dutton, Director
Enforcement Division (6E)

cc: Texas Department of Water Resources

CONDITIONS OF OPERATION DURING
INTERIM STATUS

Date prepared: July 27, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location and EPA identification number:

Name: Rexene Co-Bayport Plant

Location: 9802 Fairmont Parkway

Pasadena, Texas

EPA ID No: TXD 02 080 0371

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265:

Owner's name: El Paso Polyolefins Company

Operator's name: Rexene Company

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated:

Process Code	Design Capacity Amount	Unit of Measure
S02	69,000.	Gallons
S01	55.	Gallons
T04	9,600.	Gallons per day

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid wastes exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers:

F003 D001 D002 D003

EPA Region VI, Dallas, TX 75270
(214) 767-2765

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

OCT 27 1982

See TXD 98062 6014

Mr. David R. Griffis
Vice President and Treasurer
El Paso Products Company
P.O. Box 3986
Odessa, Texas 79760

Reference: TXD 98 062 6014, TXD 00 083 9175, TXD 09 878 4309, TXD 02 080 0371, TXD 05 113 9006

Dear Mr. Griffis:

Thank you for your recent submittal of the required documentation to show compliance with the Resource Conservation and Recovery Act (RCRA) financial regulations, 40 CFR 265, Subpart H, as amended on April 7, 1982, 47 FR 16032, and April 16, 1982, 47 FR 16544. The State of Texas is authorized to operate an equivalent financial program in lieu of the Environmental Protection Agency. Therefore, your submittal has been forwarded to:

Mr. Robert G. Brydson, Jr.
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711
(512) 475-3345

If you have any questions, please call Henry Onsgard at (214) 767-8941 or me at (214) 767-2645.

Sincerely yours,

Stan Jorgensen

R. Stan Jorgensen, Chief
Hazardous Materials Branch

cc: Texas Department of Water Resources
RCRA File

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 27 1982

Mr. David R. Griffis
Vice President and Treasurer
El Paso Products Company
P.O. Box 3986
Odessa, Texas 79760

Reference: TXD 98 062 6014, TXD 00 083 9175, TXD 09 878 4309,
TXD 02 080 0371, TXD 05 113 9006

Dear Mr. Griffis:

Thank you for your recent submittal of the required documentation to show compliance with the Resource Conservation and Recovery Act (RCRA) financial regulations, 40 CFR 265, Subpart H, as amended on April 7, 1982, 47 FR 16032, and April 16, 1982, 47 FR 16544. The State of Texas is authorized to operate an equivalent financial program in lieu of the Environmental Protection Agency. Therefore, your submittal has been forwarded to:

Mr. Robert G. Brydson, Jr.
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711
(512) 475-3345

If you have any questions, please call Henry Onsgard at (214) 767-8941 or me at (214) 767-2645.

Sincerely yours,

R. Stan Jorgensen, Chief
Hazardous Materials Branch

cc: Texas Department of Water Resources
RCRA File

	CONCURRENCES							
SYMBOL								
SURNAME								
DATE								

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

TXD 02 080 0371
TXD 09 878 4309
TXD 00 083 9175

TXD 05113 9006 TX

EPA ID TXD 98 062 6014 Date 10/19/82

Name EL PASO PROD.

An EPA review of the attached financial information indicates the following:

[ ] Material appears to be in order.

[ ] The following deficiencies have been noted:

Closure-postclosure

[ ] No closure-postclosure information submitted
[ ] Trust fund does not meet required wording of Paragraph 264.151(a)
[ ] Surety bond does not meet required wording of Paragraph 264.151(b)
[ ] Letter of credit does not meet required wording of Paragraph 264.151(d)
[ ] Insurance policy does not meet required wording of Paragraph 264.151(e)
[ ] Fails financial test for closure
[ ] Fails financial test for postclosure
[ ] Original signatures do not appear on documentation
[ ] Letter from chief financial officer does not meet required wording of Paragraph 264.151(f)
[ ] Corporate guarantee does not meet required wording of Paragraph 264.151(g)
[ ] Inadequate/missing CPA audit of financial statement and/or accountant's opinions
[ ] Fails to address all U.S. facilities
[ ] Fails to include closure/postclosure cost estimates
[ ] Insufficient/missing CPA special report
[ ] Other _____

Liability

[ ] No liability information submitted
[ ] Insurer not qualified
[ ] Insurance certificate does not meet required wording of Paragraph 264.151(j)
[ ] Insurance endorsement does not meet required wording of Paragraph 264.151(i)
[ ] Policy limits are beneath RCRA minimums
[ ] Policy not in effect by required date
[ ] Original signatures do not appear on documentation
[ ] Fails financial test for liability
[ ] Letter from chief financial officer does not meet required wording of Paragraph 264.151(g)
[ ] Inadequate/missing CPA audit of financial statement and/or accountant's opinions
[ ] Fails to address all U.S. facilities
[ ] Original signatures do not appear on documentation
[ ] Other _____

El Paso
Products Company

P.O. BOX 3986
ODESSA, TEXAS 79760

PHONE 915/333-7200

October 5, 1982

United States Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Texas 75207

Attention: Mr. Henry Onsgood
RCRA Financial Requirements

Dear Mr. Onsgood:

I am Vice President and Treasurer of El Paso Products Company. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The Current closure and/or post-closure cost estimates covered by the test are shown for each facility:

A. EPA Identification Number: TXD 980626014
El Paso Products Company
South Grandview
Odessa, Texas
Closure Cost Estimate: $83,900
Post-Closure Cost Estimate: -0-

B. EPA Identification Number: TXD 000839175
El Paso Products Company

Corpus Christi, Texas
Closure Cost Estimate: $15,000
Post-Closure Cost Estimate: -0-

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or

post-closure care so guaranteed are shown for each facility:

A. EPA Identification Number TXD 098784309
El Paso Polyolefins Company
South Grandview
Odessa, Texas
Closure Cost Estimate: $8,000
Post-Closure Cost Estimate: -0-

B. EPA Identification Number TXD 020800371
El Paso Polyolefins Company
Bayport, Texas
Pasadena, Texas
Closure Cost Estimate: $17,000
Post-Closure Cost Estimate: -0-

C. EPA Identification Number NJD 070955091
El Paso Polyolefins Company

Paramus, New Jersey 07652
Closure Cost Estimate: $ 7,000
Post-Closure Cost Estimate: -0-

D. EPA Identification Number TXD 051139006
El Paso Hydrocarbons Company
Foster Plant
Odessa, Texas
Closure Cost Estimate: $ 8,000
Post-Closure Cost Estimate: -0-

E. EPA Identification Number WID 600713255
Consolidated Thermoplastics Company
1701 First Avenue
Chippewa Falls, Wisconsin 54729
Closure Cost Estimate: $ 500
Post-Closure Cost Estimate: -0-

F. EPA Identification Number DED 069041317
Consolidated Thermoplastics Company
P. O. Box 27
Harrington, Delaware 19952
Closure Cost Estimate: $ 500
Post-Closure Cost Estimate: -0-

G. EPA Idenfication Number CAT 080010952
Consolidated Thermoplastics Company
2520 S. Birch Street
Santa Ana, California 92707
Closure Cost Estimate: $ 500
Post-Closure Cost Estimate: -0-

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

A. EPA Identification Number: TXD 980626014
El Paso Products Company
South Grandview
Odessa, Texas
Closure Cost Estimate: $83,900
Post-Closure Cost Estimate: -0-

B. EPA Identification Number: TXD 000839175
El Paso Products Company

Corpus Christi, Texas
Closure Cost Estimate: $15,000
Post-Closure Cost Estimate: -0-

C. EPA Identification Number TXD 098784309
El Paso Polyolefins Company
South Grandview
Odessa, Texas
Closure Cost Estimate: $ 8,000
Post-Closure Cost Estimate: -0-

D. EPA Identification Number TXD 020800371
El Paso Polyolefins Company
Bayport Plant
Pasadena, Texas
Closure Cost Estimate: $17,000
Post Closure Cost Estimate: -0-

E. EPA Identification Number TXD 051139006
El Paso Hydrocarbons Company
Foster Plant
Odessa, Texas
Closure Cost Estimate: $ 8,000
Post-Closure Cost Estimate: -0-

F. EPA Identification Number DED 069041317
Consolidated Thermoplastics Company
P. O. Box 27
Harrington, Delaware 19952
Closure Cost Estimate: $ 500
Post-Closure Cost Estimate: -0-

806-333-7200

G. EPA Identification Number CAT 080010952
Consolidated Thermoplastics Company
2520 S. Birch Street
Santa Ana, California 92707
Closure Cost Estimate: $ 500
Post-Closure Cost Estimate: -0-

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

NONE

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

ALTERNATIVE 1

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)	$ 140,400
*2.	Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4).	304,001,000
*3.	Tangible net worth	229,520,000
*4.	Net worth	252,028,000
*5.	Current assets	320,944,000
*6.	Current liabilities	174,863,000
7.	Net working capital (line 5 minus line 6)	146,081,000
*8.	The sum of net income plus depreciation, depletion, and amortization	59,012,000
*9.	Total assets in U. S. (required only if less than 90% of firm's assets are located in the U. S.).	All Assets are located in the U. S.

		Yes	No
10.	Is line 3 at least $10 million?	X	
11.	Is line 3 at least 6 times line 17?	X	
12.	Is line 7 at least 6 times line 17?	X	
*13.	Are at least 90% of firm's assets located in the U. S.? If not, complete line 14.	X	
14.	Is line 9 at least 6 times line 1?		N.A.
15.	Is line 2 divided by line 4 less than 2.0?	X	
16.	Is line 8 divided by line 2 greater than 0.1?	X	
17.	Is line 5 divided by line 6 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

El Paso Products Company

David R. Griffis

David R. Griffis
Vice President and Treasurer
September 28, 1982.

Main Hurdman
Certified Public Accountants

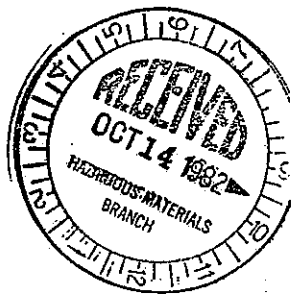
Suite 400, State National Plaza, Odessa, TX 79762, Telephone: 915/362-6301

The Board of Directors
El Paso Products Company

In accordance with 40 CFR Parts 264 and 265, we have compared the data which the letter (dated September 20, 1982) from David R. Griffis, Vice President and Treasurer of El Paso Products Company to Henry Onsgood of the United States Environmental Protection Agency, specifies as having been derived from the independently audited financial statements of El Paso Products Company as of and for the year ended December 31, 1981, with the amounts in such financial statements. In connection with this procedure, no matters came to our attention which caused us to believe that the specified data should be adjusted.

Main Hurdman

September 28, 1982



EL PASO PRODUCTS COMPANY AND SUBSIDIARIES

Consolidated and Consolidating Financial Statements

Years Ended December 31, 1980 and 1981

10/2/84 Update

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT

INDUSTRY NAME: El Paso Products OK (713) 474-321

SITE ADDRESS: 9802 Fairmont Pkwy PHONE: (915) 333-85

ZIP: 77571 COUNTY: Harris

TDWR PERMIT OR REGIS. NO. 30486 (2–6) EPA ID NO. TXD020800371 (8–19)

INDUSTRY NAME EL PASO (21–28) DISTRICT 07 (30–31) DATE REPORT SUBMITTED M O/F Y 1084 (33–36)

TYPE OF FACILITY G F T 12 (38–40) MAJOR/NONMAJOR N (42) TYPE OF EVALUATION EV (44–45)

DATE OF EVALUATION OR ENFORCEMENT REFERRAL 05-23-84 (47–54)

DK

Types Of Violations	Deg.	Date Of Notif. Letter	Date Of Inf. Enf. Act.	Date Response Due	Date Of Actual Compliance	Resolved/ Unresolved
GWM (56–58)	(59)	(61–68)	(70–77)	(106–113)	(115–122)	(124)
INC (56–58)	(59)	(61–68)	(70–77)	(106–113)	(115–122)	(124)
CLO (56–58)	1 (59)	07-30-84 (61–68)	(70–77)	08-31-84 (106–113)	(115–122)	R (124)
FIN (56–58)	1 (59)	07-30-84 (61–68)	(70–77)	08-31-84 (106–113)	(115–122)	R (124)
PTB (56–58)	(59)	(61–68)	(70–77)	(106–113)	(115–122)	(124)
MAN (56–58)	(59)	(61–68)	(70–77)	(106–113)	(115–122)	(124)
SCH (56–58)	(59)	(61–68)	(70–77)	(106–113)	(115–122)	(124)
OTH (56–58)	3 (59)	07-30-84 (61–68)	(70–77)	08-31-84 (106–113)	(115–122)	R (124)

COMMENTS:

*01 (1–3) 006 (5–9) 0 (11) R (13) 117 (15–19) 3 (21) R (23) 153A (25–29) 3 (31) R (33) 116d (35–39) 3 (41) R (43)

173 (45–49) 1 (51) b (53) (55–59) (61) (63) (65–69) (71) (73) (75–79) (81) (83) (85–89) (91)

NUMBER OF SAMPLES: 0

DWR 0814 (Rev. 10-26-83)
Page 1 of 2

WORK NO.: 9081

SUBMITTED BY: Minnie Meadours

El Paso Chemical

PERMIT ISSUANCE TRACKING

FACILITY ID TXD020800371

NEW ENTRY X
CHANGE ENTRY ___
DELETE ENTRY ___

PERMIT NO 1
ACTION CODE 13
SEQUENCE NO 4 12-13-84

DATE DUE ___
ACTION DATE 84/10/19

STATUS CODE DP

RESPONSIBLE AGENCY S
RESPONSIBLE PERSON ___

FREE FIELD 1 _
FREE FIELD 2 __
FREE FIELD 3 ___
FREE FIELD 4 ___
FREE FIELD 5 ___
FREE FIELD 6 ___

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO
PERMIT ACTION LINK CHANGED FROM TO
DELETE PERMIT ACTION LINK TO

PERMIT ISSUANCE TRACKING

FACILITY ID ___

NEW ENTRY ___
CHANGE ENTRY ___
DELETE ENTRY ___

PERMIT NO ___
ACTION CODE __
SEQUENCE NO ___

DATE DUE ___
ACTION DATE ___

STATUS CODE

RESPONSIBLE AGENCY _
RESPONSIBLE PERSON ___

FREE FIELD 1 _
FREE FIELD 2 __
FREE FIELD 3 ___
FREE FIELD 4 ___
FREE FIELD 5 ___
FREE FIELD 6 ___

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO
PERMIT ACTION LINK CHANGED FROM TO

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

GENERATOR'S NAME: El Paso Products Company

Date rec'd:_____ Rec'd by:_____

XV. GENERATOR'S EPA I.D. NO.

G	T	X	D	0	2	0	8	0	0	3	7	1	T A C		1
1	2											13	14	15	

XVI. WASTE MINIMIZATION (narrative description)

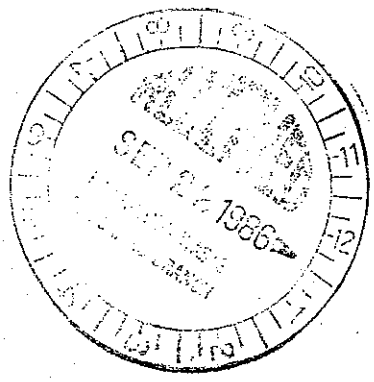
The following efforts related to waste minimization have been implemented at the facility referenced above.

Improvements in the catalyst flushing procedures at this polypropylene production facility have resulted in a reduction of approximately 50% of the waste catalyst (D003) generated under normal operating conditions.

Greater efforts directed toward increasing plant utility have resulted in an estimated 25% overall reduction of hazardous waste generated during plant shutdowns.

No useful data or information is available for a comparison with years prior to 1984.

Tear out here



File
Write

EL PASO PRODUCTS COMPANY

POST OFFICE BOX 3986
ODESSA, TEXAS 79760
PHONE: 915-333-7200

RECEIVED
MAR 27 9 14 AM '86
OFFICE OF ADMIN.

March 7, 1986

File
II.A.4

Regional Administrator
Environmental Protection Agency
1201 Elm Street
Dallas, TX 75270

RE: Letter from Chief Financial Officer to demonstrate liability coverage

Gentlemen:

I am the chief financial officer of El Paso Products Company, P.O.Box 2986, Odessa, Texas 79760. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

El Paso Products Co.
2400 S. Grandview, Box 3986
Odessa, TX 79760
EPA No. TXD 0980626014

El Paso Products Co.
9802 Fairmont Parkway
Pasadena, TX 77507
EPA No. TXD 020800371

RECEIVED
MAR 28 1986
HAZARDOUS WASTE
PROGRAMS BRANCH

El Paso Products Co.
2501 S. Grandview, Box 3986
Odessa, TX 79760
EPA No. TXD 098784309

El Paso Products Co.
2000 Violet Rd., Box 10247
Corpus Christi, TX 78410
EPA No. TXD 000839175

Consolidated Thermoplastics Co.
1701 First Avenue
Chippewa Falls, Wisconsin 54729
EPA No. WID 000713255

Consolidated Thermoplastics Co.
1492 Santa Fe Drive
Tustin, California 92680
EPA No. CAX 000116186

Consolidated Thermoplastics Co.
Rt. 13 and Conrail RR, Box 27
Harrington, Delaware 19952
EPA No. DED 069041317

Consolidated Thermoplastics Co.
2520 S. Birch Street
Santa Ana, California 92707
EPA No. CAT 080010952

This owner or operator is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's indepently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984.

Alternative I

1.	Amount of annual aggregate liability coverage to be demonstrated	$ 2,000,000	
*2.	Current assets	$133,692,000	
*3.	Current liabilities	$ 70,469,000	
4.	Net working capital (line 2 minus line 3)	$ 63,223,000	
*5.	Tangible net worth	$ 21,816,000	
*6.	If less than 90% of assets are located in the U.S., give total U.S. assets	$ _____	
		Yes	No
7.	Is line 5 at least $10 million?	X	___
8.	Is line 4 at least 6 times line 1?	X	___
9.	Is line 5 at least 6 times line 1?	X	___
*10.	Are at least 90% of assets located in the U.S.? If not, complete line 11.	X	___
11.	Is line 6 at least 6 times line 1?	___	___

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.

B.E. Seltz
Senior Vice President, Finance
March 7, 1986

BES/vm

Coopers & Lybrand

certified public accountants

The Board of Directors
Rexene Corporation:

We have examined the consolidated balance sheet of Rexene Corporation and Subsidiary as of December 31, 1984, and the related consolidated statements of income, changes in stockholders' equity and changes in financial position for the year then ended. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the aforementioned consolidated financial statements present fairly the financial position of Rexene Corporation and Subsidiary as of December 31, 1984, and the results of their operations and the changes in their financial position for the year then ended in conformity with generally accepted accounting principles.

Coopers & Lybrand

Dallas, Texas
March 8, 1985, except for Notes 11 and 12
as to which the date is April 19, 1985
and May 10, 1985, respectively

Coopers &Lybrand
certified public accountants
1999 Bryan Street
Suite 3000
Dallas, Texas 75201
telephone (214) 754-5000
in principal areas of the world

The Board of Directors
El Paso Products Company

At your request, we have compared the data enumerated below to the independently audited financial statements of Rexene Corporation and Subsidiary for the year ended December 31, 1984. Such data was found to be in agreement with the audited financial statements. El Paso Products Company is the sole subsidiary of Rexene Corporation. It is understood this report is solely for inclusion with a letter from B. E. Seltz, Vice President and Treasurer of El Paso Products Company to various Regional Administrators of the Environmental Protection Agency and the Regional Administrator of the Texas Water Commission and is not to be referred to for any other purpose or distributed to any other person. The data compared is as follows:

Current assets	$133,692,000
Current liabilities	$70,469,000
Tangible net worth	$21,816,000

We also concur with the statement, included in the above mentioned letter, that 90% of Rexene Corporation and Subsidiary's assets are located in the United States.

Because the above procedure does not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on the above data. In connection with the procedure referred to above, no matters came to our attention which caused us to believe the specified data should be adjusted. This report relates only to the data specified above and does not extend to any financial statements of Rexene Corporation and Subsidiary, taken as a whole.

Coopers & Lybrand

March 24, 1986
Dallas, Texas

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under subtitle C of RCRA.

EPA I.D. NUMBER

TXD020800371 02/27/95

LYONDELL POLYMERS CORP
P.O. BOX 2006
PASADENA , TX 77505
HUGH THIBODEAUX PLT MGR

INSTALLATION ADDRESS

9802 FAIRMONT PARKWAY
PASADENA ,TX 77507

EPA Form 8700-12A (6-90)

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

TXD020800371 11/18/97

EQUISTAR CHEMICAL BAYPORT
PO BOX 2006
PASADENA , TX 775051195
PHILLIP NANGLE ENV ENGINEER

INSTALLATION ADDRESS

9802 FAIRMONT PARKWAY
PASADENA ,TX 77507

EPA Form 8700-12A (6-90)

Please print or type with ELITE type (12 char. s per inch) in the unshaded areas only

Form Approved OMB No. 2050-0028

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

Date Received (For Official Use Only)

RECEIVED NOV 12 1997

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. Initial Notification

[X] B. Subsequent Notification *(Complete item C)*

C. Installation's EPA ID Number: TXD020800371

II. Name of Installation *(Include company and specific site name)*

Equistar Chemical Bayport

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 9802 Fairmont Parkway

Street (Continued):

City or Town	State	Zip Code
Pasadena	TX	77505-1195

County Code	County Name
101	Harris

IV. Installation Mailing Address *(See instructions)*

Street or P.O. Box: P O Box 2006

City or Town	State	Zip Code
Pasadena	TX	77505-1195

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name (Last)	(First)
Nangle	Philip

Job Title	Phone Number (Area Code and Number)
Env Engineer	281-291-2867

VI. Installation Contact Address *(See instructions)*

A. Contact Address: Location [0] Mailing [X]

B. Street or P.O. Box: ~~9802 Fairmont Parkway~~

City or Town	State	Zip Code
~~Pasadena~~	~~TX~~	~~77505-1195~~

VII. Ownership *(See instructions)*

A. Name of Installation's Legal Owner: Equistar Chemical LP

Street, P.O. Box, or Route Number: 1221 McKinney Suite 1600

City or Town	State	Zip Code
Houston	TX	77010-

Phone Number (Area Code and Number)	B. Land Type	C. Owner Type	D. Change of Owner Indicator	(Date Changed) Month Day Year
713-652-7200	P	P	Yes [X] No [ ]	12 01 97

EPA Form 8700-12 (Rev. 10/09/96)

Thead gaged 11/19/97

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-GT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to Instructions)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220-2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] 5. Other - specify

[ ] 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.

4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Boiler and/or Industrial Furnace
     - [ ] 1. Smelter Deferral
     - [ ] 2. Small Quantity Exemption

   Indicate Type of Combustion Device(s)
   - [ ] 1. Utility Boiler
   - [ ] 2. Industrial Boiler
   - [ ] 3. Industrial Furnace

[ ] 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
   - [ ] a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
   - [ ] a. Utility Boiler
   - [ ] b. Industrial Boiler
   - [ ] c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
   - a. Transporter
   - b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - [ ] a. Process
   - [ ] b. Re-refine

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
X	X	X	X	D007, D009

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
F003					
7	8	9	10	11	12

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
Roy Kreitz	Roy Kreitz Polypropylene Production Manager	10/17/97

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

QA QCd JWH 11/20/97

Please print or type with ELITE type (12 chara per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the *Resource Conservation and Recovery Act*).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

RECEIVED
Date Received (For Official Use Only)
NOV 12 1997
Area 11 1997

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. Initial Notification [X] B. Subsequent Notification *(Complete item C)*

C. Installation's EPA ID Number: TXD020800371

II. Name of Installation *(Include company and specific site name)*

Equistar Chemical Bayport

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 9802 Fairmont Parkway

Street *(Continued)*:

City or Town: Pasadena | State: TX | Zip Code: 77505-1195

County Code: 101 | County Name: Harris

IV. Installation Mailing Address *(See instructions)*

Street or P.O. Box: POBox20006

City or Town: Pasadena | State: TX | Zip Code: 77505-1195

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(Last)*: Nangle | *(First)*: Philip

Job Title: Env Engineer | Phone Number *(Area Code and Number)*: 281-291-2867

VI. Installation Contact Address *(See instructions)*

A. Contact Address Location: X | Mailing: X

B. Street or P.O. Box: 9802 Fairmont Parkway

City or Town: Pasadena | State: TX | Zip Code: 77505-1195

VII. Ownership *(See instructions)*

A. Name of Installation's Legal Owner: Equistar Chemical LP

Street, P.O. Box, or Route Number: 1221 McKinney Suite 1600

City or Town: Houston | State: TX | Zip Code: 77010-

Phone Number *(Area Code and Number)*: 713-652-7200

B. Land Type: P | C. Owner Type: P

D. Change of Owner Indicator: Yes [X] No [ ]

(Date Changed) Month: 12 Day: 01 Year: 97

Jr 10/22/97

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-GA

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to Instructions)*

A. Hazardous Waste Activity

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   - [ ] b. 100 to 1000 kg/mo (220-2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs)
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   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] 5. *Other - specify*

[ ] 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.

4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Boiler and/or Industrial Furnace
     - [ ] 1. Smelter Deferral
     - [ ] 2. Small Quantity Exemption

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   - [ ] 1. Utility Boiler
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   - [ ] b. Industrial Boiler
   - [ ] c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
   - a. Transporter
   - b. Transfer Facility
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   - [ ] a. Process
   - [ ] b. Re-refine

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

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X	X	X	X	D007	D009	

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
F003					
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
Roy Kreitz	Roy Kreitz Polypropylene Production Manager	10/17/97

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

UNIVERSE TRACKING REQUEST

RWC ID: 30486 EPA ID: TXD020800371

FACILITY NAME: Lyondell Petrochemical Company-Polymers Div.

ADD: LQG DELETE: TS CHANGE: ____ TO: ____

example: LD,TS GN,LQG SQG — LD,TS,LQG,SQG — LQG, LD — SQG, TS

PROCESS TYPE:

(CIRCLE THE APPROPRIATE PROCESS TYPE)
Each code in parenthesis can only be applied to the process type that appears with it.

PROCESS TYPE	**POSSIBLE UNITS OF MEASURE	PROCESS TYPE	POSSIBLE UNITS OF MEASURE	PROCESS TYPE	POSSIBLE UNITS OF MEASURE
D79-WDW	(G,L,U,V)	SO1-C	(G,L)	TO1-T	(U,V)
D80-LF	(A,F)	SO2-T	(G,L)	TO2-SI	(U,V)
D81-LT	(B,Q,Y,C)	SO3-WP	(Y,C)	TO3-I	(D,W, E,H,K)
D82-OcD	(U,V)	SO4-SI	(G,L)	TO4-Oth	(D,W, U,V,N, S,J,R)
D83-SI	(G,L)				

**CODES FOR POSSIBLE UNITS OF MEASURE:

A=acre-feet
B=acres
C=cubic meters
D=short tons per hour
E=gallons per hour
F=hectare-meter
G=gallons
H=liters per hour
J=pounds per hour
K=BTU's per hour
L=liters
N=short tons per day
Q=hectares
R=kilograms per hour
S=metric tons per day
U=gallons per day
V=liters per day
W=metric tons per hour
Y=cubic yards

PROCESS / CAPACITY AMOUNT: _____

** UNIT OF MEASURE USED: _____

UNIT STATUS: (CIRCLE)

B - verified as actually existing
L - determined not to exist as a result of a subsequent investigation
R - found to exist as a result of a subsequent investigation
N - permitted, not yet under construction
C - permitted, under construction
O - previously operated, regulated. now unregulated

* POSSIBLE SUPERFUND SITE ____ YES __x__ NO

REQUESTED BY: Mark Gates DATE: 12/14/95

96 JAN 23 PM 3:49

NON-NOTIFIER REQUEST FORM

NON-NOTIFIER ASSIGNMENT

TWC ID: _____ YES ___ NO ___

EPA ID: _____ YES ___ NO ___

(CIRCLE)
ACTIVITY TYPE: TS LD LQG=1 SQG=2 CESQG=3
TRANSPORTER=X ISW MSW WDW NON-HANDLER

STATE STATUS DESC: S= Solid Waste Generator Only
P= Handler Status Not Yet Defined

FACILITY NAME: _____

MAILING ADDRESS: _____

_____

*SITE ADDRESS: _____

_____

_____ZIP_____

DISTRICT: _____ COUNTY: _____

*** SITE ADDRESS cannot be a rural route or box number. It must be the physical address of the site. And it must be able to be located on a map based upon description.**

*** POSSIBLE SUPERFUND SITE _____ YES _____ NO**

.....

NAME CHANGE REQUEST:

TWC ID: 30486

EPA ID: TXD020800371

OLD FACILITY NAME: Lyondell Polymers Corporation

NEW FACILITY NAME: Lyondell Petrochemical Company-Polymers Division

REQUESTED BY: Mark Gates DATE: 12/14/95

RCRA

NON-NOTIFIER REQUEST FORM

NON-NOTIFIER ASSIGNMENT:

TWC ID: _____ YES ___ NO ___

EPA ID: _____ YES ___ NO ___

(CIRCLE)

ACTIVITY TYPE: TS LD LQG=1 SQG=2 CESQG=3

TRANSPORTER=X ISW MSW WDW NON-HANDLER

STATE STATUS DESC: S= Solid Waste Generator Only

P= Handler Status Not Yet Defined

FACILITY NAME: _____

MAILING ADDRESS: _____

_____

*SITE ADDRESS: _____

_____

_____ ZIP _____

DISTRICT: _____ COUNTY: _____

*** SITE ADDRESS cannot be a rural route or box number. It must be the physical address of the site. And it must be able to be located on a map based upon description.**

** POSSIBLE SUPERFUND SITE ___YES ___NO*

NAME CHANGE REQUEST:

TWC ID: 30486

EPA ID: TXD020800371

OLD FACILITY NAME: Rexene Products

NEW FACILITY NAME: Lyondell Polymers Corporation

REQUESTED BY: Susan Bredehoeft DATE: 1/18/95

Handler Name _____ Inspection End Date: ___/___/___ Page ___ of ___

TNRCC # _ _ _ _ _ _ EPA ID # _ _ _ _ _ _ _ _ _ _ _ _ TNRCC Permit # _ _ _ _ _ _ Inspector/Coordinator _ _ _ County _____ Region _ _

1. STATUS	2. PREVIOUS INSPECTION DATA			3. VIOLATION		4. RULE CITATION				5. ENFORCEMENT			6. COMPLIANCE STATUS		
NEW (N) SAME (S) RESOLVED (R)	RCRIS VIOLATION SEQUENCE #	INSPEC. TYPE	INSPECTION END DATE	AREA	CLASS	REG TYPE S/F	#	TNRCC STATE RULE	EPA FEDERAL RULE MIRROR PROVISION	P	ESC	TYPE ACTION	DATE ISSUE ENFORCEMENT ACTION	FINAL SCHEDULE DATE	ACTUAL DATE OF COMPLIANCE
N S R					1 2 3	S F	9								
N S R					1 2 3	S F	10								
N S R					1 2 3	S F	11								
N S R					1 2 3	S F	12								
N S R					1 2 3	S F	13								
N S R					1 2 3	S F	14								
N S R					1 2 3	S F	15								
N S R					1 2 3	S F	16								
N S R					1 2 3	S F	17								

— INSTRUCTIONS —

1. STATUS: Circle the appropriate status of the violation.

2. PREVIOUS INSPECTION DATA: *Note that for **all** Same and/or Resolved Violations cited during a Previous Inspection, you MUST verify the RCRIS compliance status and obtain the following violation information:* a) Enter the RCRIS Violation Sequence # (i.e., #S0001); b) Enter the RCRIS Evaluation Type pertaining to the previous inspection; and c) Enter the RCRIS Evaluation Date pertaining to the previous inspection end date.

3. VIOLATION: a) Enter the appropriate Area of Evaluation circled above that corresponds to the violation area being cited; and b) Circle the appropriate Class of Violation (i.e., Class 1 or 2 for EPA Federal Provisions **or** Class 3 for TNRCC State Provisions ONLY).

4. RULE CITATION: a) Circle the appropriate Regulation Type, either S for TNRCC State Rule Only, or F for both TNRCC State Rule/EPA Federal Rule Mirror Provision; b) Enter the appropriate TNRCC State Rule Citation (i.e., 335.62); and c) Enter the appropriate EPA Federal Rule Citation (i.e., 262.11).

5. ENFORCEMENT: Enter the appropriate type of Enforcement Action Taken (i.e., 120 for Regional Office Written Informal NOV). *Note that for **all** previously cited violations being referred for ESC review, please be sure to enter the RCRIS Violation Sequence # and leave the Enforcement & Compliance Status blocks blank.*

6. COMPLIANCE STATUS: a) Enter the date the Enforcement Action (i.e., 120) was issued; b) Enter the Final Date the violation is scheduled for compliance. *Note that according to our TNRCC/EPA MOU, compliance must be achieved for ALL Class I violations within 135 days of the inspection date, **or** a decision must be made to escalate the violation for timely and appropriate formal enforcement action. If it appears that compliance cannot be achieved within 135 days, the Regional Office MUST refer the case for ESC review and appropriate action on or before the 135 day deadline. **Reference the Compliance Schedule Date Table;*** and c) Enter the Actual Date of Compliance for all Resolved Violations.

Enforcement Comment: _____

ESC Date: ___/___/___ (1 5 0) Priority: HPV MPV LPV State

C.O. Enforcement Coordinator: _____ Proposed action: _____ Due: ___/___/___

C.O. Staff Attorney: _____ Alternate schedule: _____ Due: ___/___/___

PENALTY DATES & AMOUNTS:

Date Assessed: ___/___/___ Amount: _____

Date Settled: ___/___/___ Amount: _____

Date Payment: ___/___/___ Amount: _____

RCRIS DATA ENTRY

Data Entry By: D J

Data Entry Date: ___/___/___

PARADOX DATA ENTRY

Data Entry By: D J

Data Entry Date: ___/___/___

CENTRAL OFFICE USE ONLY
ENFORCEMENT TYPE ACTION CODES:

101 = Class 3 State Petition
103 = Class 3 State Order
115 = Referral to DOD
117 = Referral to Closures
119 = Referral to Permits
121 = Written Informal (NOV)
150 = ESC Review
210 = RCRA Petition
220 = ISE Petition
310 = RCRA Agreed Order
320 = ISE Order
410 = Referral to AG
510 = AG Petition
620 = AG Judgement
810 = Referral to EPA
840 = Referral to Superfund

REGIONAL OFFICE USE ONLY
ENFORCEMENT TYPE ACTION CODES:

110 = Verbal Informal
120 = Written Informal (NOV)

VIOLATION CLASSIFICATION:

Class 1: EPA Federal Rule (Environmentally Significant)

Class 2: EPA Federal Rule (Non-Environmentally Significant)

Class 3: TNRCC State Rule Only